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**REMEDIATION DESIGN REPORT  
AND  
REMEDIATION ACTION WORK PLAN  
  
DEWATERING PIT SOLIDS REMOVAL  
  
SIMPLOT PLANT AREA  
EASTERN MICHAUD FLATS SUPERFUND SITE**

November 25, 2002

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consulting scientists and engineers

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DEWATERING PIT SOLIDS REMOVAL  
SIMPLOT PLANT AREA  
EASTERN MICHAUD FLATS SUPERFUND SITE**

November 25, 2002

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## 1.0 INTRODUCTION

This document presents J.R. Simplot Company's Remedial Design Report (RDR) and Remedial Action Work Plan (RAWP) for the removal and disposal of residual solids from the Dewatering Pit in the Simplot Plant Area of the Eastern Michaud Flats (EMF) Superfund Site located near Pocatello, Idaho. This action is part of the comprehensive Site remedy as described in the Record of Decision (ROD; USEPA, 1998) and subsequent Consent Decree for the Simplot Plant Area (USEPA, 2002).

This RDR/RAWP describes the actions required to implement the Dewatering Pit component of the final remedy. As described in the Statement of Work for the Simplot Plant Area (Appendix B to the Consent Decree), the Dewatering Pit element of work includes the excavation of residual solids from the Dewatering Pit and relocation of the excavated material to the gypsum stack.

The tasks that comprise the relatively straightforward design portion of this remedial component are addressed herein in Sections 2 and 3 and include the presentation of existing conditions, a discussion of the required work activities, and procedures for confirming that the performance standard for this element of work have been achieved. A set of construction drawings, graphically depicting the requirements of this work is provided as Appendix A. Because of the limited nature of the work, detailed technical specifications are not necessary to guide the completion of this element, however a statement of work has been prepared and is included as Appendix B. This Statement of Work will be used in conjunction with the drawings and other contract documents to solicit bids from contractors and to guide the implementation of the remedial action.

The remedial action (RA) planning portion of this document is presented in Section 4, which provides a detailed plan of action for completing the remedial activities. This RA Work Plan portion of the document addresses construction sequencing and scheduling, construction management for Dewatering Pit remediation and reporting requirements during construction. The required elements of a Construction Management Plan for the Dewatering Pit element of work are addressed in Section 5. A Construction Health and Safety Plan, required by the Consent Decree Statement of Work, will be submitted under separate cover.

## 1.1 Site Description And Project History

The EMF Site is located near the City of Pocatello, Idaho and includes two industrial facilities (Drawing 0121C-101; Appendix A): the FMC Elemental Phosphorus Facility (ceased operations in December 2001) and the J.R. Simplot Don Plant. FMC produced elemental phosphorus. The Don Plant produces phosphoric acid and a variety of liquid and solid fertilizers. The EPA has divided the Site into three areas: The FMC Plant Area includes the FMC facility and adjacent land owned by FMC; The Simplot Plant Area includes the Don Plant and adjacent land owned by Simplot; and The Off-Plant Area which surrounds the FMC- and Simplot-Plant Areas.

The Simplot Don Plant covers approximately 745 acres and adjoins the eastern property boundary of the FMC facility. The main portion of the plant lies approximately 500 feet southwest of the Portneuf River. Of the 745 acres, approximately 400 acres are committed to the gypsum stack. Another 185 acres are occupied by the plant and its infrastructure. A significant portion of the remaining acreage to the south and southeast of the plant consists of cliffs and rugged steep terrain. A Union Pacific Railroad right-of-way is adjacent to the northern fence line of the Don Plant and passes through the northern portion of the Simplot Subarea, paralleling U.S. Highway 30. Access to the Don Plant is provided by I-86 and U.S. Highway 30.

The Don Plant began production of a single superphosphate fertilizer in 1944. Phosphoric acid production began in 1954. Currently, the plant produces 12 principal products, including five grades of solid fertilizers and four grades of liquid fertilizers. The principal raw materials for the process are phosphate ore, which is transported to the facility via a slurry pipeline from the Smoky Canyon mine, sulfur, and ammonia. The primary byproduct from the Don Plant process is gypsum (calcium sulfate) which is stacked on site.

An Administrative Order on Consent (AOC) was issued by the U.S. Environmental Protection Agency (EPA) on May 30, 1991 and entered into voluntarily by FMC and Simplot. The AOC specified requirements for implementation of a Remedial Investigation (RI) and Feasibility Study (FS) to evaluate site conditions and remedial alternatives to address any potential threats to human health and the environment. Based on the findings of these studies, EPA issued a Record of Decision (ROD; USEPA,

1998), specifying the selected remedial actions for the Site on June 8, 1998. A Consent Decree (USEPA, 2002) between EPA and Simplot, which specified the conditions for implementing the selected remedial actions in the Simplot Plant Area was entered on May 9, 2002.

## **1.2 Remedial Action Objectives And Performance Standard For Dewatering Pit Solids Removal**

As set out in the Consent Decree Statement of Work, the objective of this action is to prevent incidental worker exposure to the solids in the Dewatering Pit by removing residual solids from the pit area.

The performance standard for this element of work will be removal of residual Dewatering Pit solids as verified through confirmatory soil sampling.

## 2.0 DEWATERING PIT CHARACTERISTICS

### 2.1 Physical Characteristics

The Dewatering Pit is located north of the Don Plant, between Highway 30 and Interstate 86, as shown on Drawings 0121C-102 and 103 (Appendix A). The Dewatering Pit was constructed and used briefly by Simplot to contain excess phosphate ore and pond solids from the period of start up for the ore slurry pipeline around 1991. The Dewatering Pit consists of three bermed areas. The surface area of the bottom of the eastern pit measures approximately 23,150 square feet. The surface area of the western pit is approximately 15,100 square feet, and the surface area of the small southern pit is 3,500 square feet. The berms are approximately eight feet high except on the side of Interstate 86, where the berms vary in height from eight to twelve feet. The berms are reportedly constructed of native soil and gravel that was excavated from the interior of the pits during construction. The solids within these pits consists primarily of phosphate ore residuals and solids precipitated by pH adjustment of irrigation waters, which can be visually recognized by their gray color in contrast to the light brown-colored native soil.

### 2.2 Chemical Characteristics

The RI found that the residual solids could be distinguished from soils based on the concentrations of various inorganic constituents, principally fluoride, phosphorus, cadmium, chromium, vanadium and zinc (Bechtel, 1996). During the RI, a single soil boring (S008B) was drilled within the eastern pit. The material encountered in the upper 2.5 feet of this boring consisted of residual solids. The material encountered in the remainder of the boring consisted of sand (2.5 to 4 feet bgs), and gravel (4 to 27 feet bgs). Soil samples were collected at the surface and from depths of 2.5, 10, 20 and 26 feet bgs.

The concentrations of indicator constituents measured in the soil samples are summarized in Table 1.

Table 1

Concentrations of Indicator Constituents in Dewatering Pit Solids and Underlying Soils

		Sampling Depth (feet)				
Constituent	Background Levels (mg/kg) <sup>1</sup>	Surface	2.5	10	20	26
		Concentration (mg/kg)				
Arsenic	7.7	15	<3.3	<2.8	<2.3	<0.55
Beryllium	1.0	5.2	0.23	0.19	0.13	0.12
Cadmium	1.9	131	0.54	0.49	0.5	0.49
Chromium	27.5	2,710	16.3	30.9	31.1	8.9
Fluoride	600	30,000	710	550	320	140
Phosphorus	672	51,300	544	501	301	407
Selenium	3.05	9.6	0.37	0.26	0.66	0.68
Zinc	52.8	3,610	35.8	37.2	24.8	25.3

Note: 1. Background constituent levels for site soils derived by EPA.

An examination of the results of the chemical analysis indicates that the sample of residual solids collected at the surface contained concentrations of a number of constituents above background soil levels. In the sample collected at a depth of 2.5 feet (just below the residual solids/soil interface), all constituents were at or below background concentrations, with the exception of fluoride (710 mg/kg).

In addition, samples were collected in October 2002 to support remedial design. Although the remedy selected by EPA in the ROD specifies that solids excavated from the Dewatering Pit be relocated to the gypsum stack, Simplot wanted to verify that the materials are not classified as a hazardous waste, which would jeopardize the Bevil exemption of the stack. Samples were collected by Simplot on October 16, 2002 in accordance with a sampling and analysis plan (Simplot, 2002). A summary of the sampling

event and its findings are provided in Appendix F. One composite sample was collected from each of the three pits and tested by the Toxicity Characteristic Leaching Procedure (TCLP) and also tested for corrosivity. The results are shown in Table 2.

**Table 2**

**Results of Toxicity Characteristic Leaching Procedure and Corrosivity Testing on Dewatering Pit Solids**

Constituent/Property	TCLP Concentrations (mg/L) or Corrosivity Value (s.u.)			
	Regulatory Level	West Pit	South Pit	East Pit
Arsenic	5.0	0.035	0.026	0.073
Barium	100.0	0.0723	0.087	0.0535
Cadmium	1.0	0.102	0.0409	0.110
Chromium	5.0	<0.006	0.0284	0.0063
Mercury	0.2	<0.0002	<0.0002	<0.0002
Lead	5.0	0.0067	<0.005	0.0062
Selenium	1.0	0.029	0.022	0.053
Silver	5.0	<0.005	<0.005	<0.005
Corrosivity	<2	5.8	7.3	5.3

As shown, the testing confirmed that the residual solids in the Dewatering Pit are not classified as hazardous waste and that disposal on the gypsum stack is appropriate.

Human health risks for site workers associated with incidental ingestion of soils were estimated in EPA's risk assessment (*Ecology and Environment*, 1996). For the Simplot Plant Area, risks were estimated for current workers (maintenance workers and gypsum stack workers) and for workers in a hypothetical future commercial/industrial scenario assuming the site is redeveloped after Simplot ceases operations and sells the land. The constituents of concern for Simplot Plant Area soils were identified as arsenic and beryllium; these are also the constituents of concern for the Dewatering Pit residuals. Constituents of concern at the site are present at background levels that often represent risks that are within

or above the acceptable risk range of  $10^{-6}$  to  $10^{-4}$ . Therefore, the risk assessment calculated incremental risks; risks associated with elevated constituent concentrations minus risks associated with background concentrations. Using the approach used in the risk assessment and the concentrations shown in Table 1 results in estimated cancer risks due to incidental ingestion of Dewatering Pit residual solids as follows:

- Simplot Maintenance Workers: for arsenic an incremental cancer risk of  $1.3 \times 10^{-6}$  (total cancer risk of  $2.7 \times 10^{-6}$  minus a background cancer risk of  $1.4 \times 10^{-6}$ ), and for beryllium an incremental cancer risk of  $1.9 \times 10^{-6}$  (total cancer risk of  $2.3 \times 10^{-6}$  minus background of  $0.4 \times 10^{-6}$ ). It should be noted that the risk assessment approach assumed that an individual worker performs activities in the Dewatering Pit area for 75 days per year for a period of 25 years. This area is not within the main plant area and in fact no work has been performed in or around the Dewatering Pit. The risk estimates are therefore highly conservative.
- Hypothetical Future Workers: for arsenic an incremental cancer risk of  $2.2 \times 10^{-6}$  (total cancer risk of  $4.6 \times 10^{-6}$  minus a background cancer risk of  $2.4 \times 10^{-6}$ ), and for beryllium an incremental cancer risk of  $3.2 \times 10^{-6}$  (total cancer risk of  $3.9 \times 10^{-6}$  minus background of  $0.7 \times 10^{-6}$ ). The risks were estimated based on the assumption that activities would be performed by an individual worker 250 days per year for 25 years.

As shown, estimated risks are within the acceptable risk range of  $10^{-6}$  to  $10^{-4}$ . EPA's guidance (OSWER Directive 9355.0-30, "Role of the Baseline Risk Assessment in Superfund Remedy Selection Decisions") states that EPA should clearly explain why remedial action is warranted if baseline risks are within the acceptable risk range of  $10^{-6}$  to  $10^{-4}$ . A risk manager may decide that a level of risk lower than  $10^{-4}$  warrants remedial action where, for example, there are uncertainties in the risk assessment results. Simplot is not aware of any such explanation. In addition, the risk levels are below the cleanup objective for soils set out by EPA in its ROD: prevent ingestion or inhalation of soils containing contaminants of concern at levels that pose estimated excess risks above  $1 \times 10^{-4}$ , a non-cancer risk hazard quotient of 1, or site-specific background levels where that is not practicable. Based on EPA's cleanup objective, no remediation should be required to address risks associated with Dewatering Pit solids. In any event, it is worth noting that estimated health risks for the Dewatering Pit are low.

To demonstrate compliance with the performance standard for this remedial action element, as discussed in Section 1.2, confirmation soil sampling will be performed following removal of the residual solids. The constituents of concern for the Dewatering Pit identified by EPA based on their Human Health Risk Assessment are arsenic and beryllium. The goal of remediation of the Dewatering Pit is to reduce the

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estimated cancer risks associated with long-term incidental ingestion to below  $10^{-6}$ . Using the approach and assumptions used in the Human Health Risk Assessment, results in removal confirmation levels of 11 mg/kg arsenic and 2.4 mg/kg beryllium which correspond to an incremental cancer risk of  $10^{-6}$ . These risk-based removal confirmation values are appropriate because lower concentrations would result in material removal to be required after potential human health risk levels are below the acceptable range. Confirmation soil sampling procedures are discussed in Section 3.2.

### 2.3 Estimated Volume Of Dewatering Pit Solids

The volume of the residual solids to be removed from the Dewatering Pits was estimated in the Prefinal Remedial Design Report/Draft Remedial Action Work Plan at approximately 6,800 cubic yards. This quantity estimate assumed a total surface area for the three pits of 41,750 square feet, an average excavation depth of 3.5 feet (documented in a single RI sample), and includes a 5% swell factor and 20% contingency. Since that report was prepared, Simplot has inspected the pits and performed some shallow excavations to provide a better estimate of material quantities. The inspection, conducted on August 8, 2002, found that the residual solid material appears to be homogeneous and no layering was observed. In the West Dewatering Pit (Drawing 0121C-103) the depth of residual solids was observed at five inches deep in the middle and less deep toward the edges. In the East Dewatering Pit, the solids were approximately 12 to 14 inches deep in the middle of the pit. The South Dewatering Pit is a much smaller area and inspection found that residual solids are typically half an inch deep or less. Using these measured depths and the pit surface areas results in a revised material volume estimate of 1,500 cubic yards (including a 5% swell factor and 20% contingency).

### 3.0 REMEDIAL DESIGN

This section of the RDR/RAWP provides a general discussion of the required elements of the Dewatering Pit remedial action and a detailed description of the procedures for confirming that the performance standard is met. Construction drawings and a statement of work, which will be used to solicit bids from contractors and to guide the implementation of the remedial action are included in Appendices A and B, respectively.

#### 3.1 Excavation And Transportation Of Dewatering Pit Solids

The location of the Dewatering Pit area with respect to the Don Plant is shown on Drawing 0121C-102. Drawing 0121C-103 presents a site plan of the Dewatering Pit area and indicates the approximate removal areas. Access to the Dewatering Pit area is provided via a gated gravel road off of Highway 30, which also provides access to the adjacent irrigation ponds. As discussed in Section 2.0, the Dewatering Pit residual solids targeted for removal are gray in color, visually distinct from the light-brown native soil. Excavation of the residual solids will be performed using standard earthmoving equipment. Material will be excavated and loaded directly into haul trucks for transport to the gypsum stack. The residual solids will be placed on the lower gypsum stack at the direction of Simplot operations personnel. As the gypsum stack grows due to ongoing Don Plant operations, the Dewatering Pit solids will be covered by gypsum.

Excavation of the residual solids will be guided by visual observation. To aid in the visual identification of the pit solids and underlying native soil, a Munsell Color Chart will be used to assign color notations (hue, value, and chroma ) to the solids and soil. Excavation will proceed both horizontally and laterally until there is a visible change in the material type (based on reference to the color notations) indicating the interface with native soil. After reaching these excavation limits, confirmation sampling will be performed as described in Section 3.2.

### 3.2 Confirmation Soil Sampling

Following excavation of the Dewatering Pit residual solids based on visual observation, samples will be collected at the base of the excavation to confirm that the solids have been removed. As discussed in Section 2.2, removal of the residual solids will be confirmed when the concentrations in the 0 to 6 inch depth interval of the remaining underlying soil are less than 11 mg/Kg arsenic, and 2.4 mg/Kg beryllium.

*Sampling of underlying soils in the excavated areas will be performed to evaluate the arsenic and beryllium concentrations. Field and laboratory procedures that will be followed during confirmation sampling are described in Section 5.2.*

If the average arsenic or beryllium concentration for an individual pit is above the removal confirmation level, an additional six-inches of soil will be excavated in the sampling sector(s) that exceed the confirmation value. The area will be re-sampled and a new average arsenic or beryllium concentration calculated for the pit. This process will be continued until the confirmation requirement is achieved or excavation has occurred to three feet below the visually identified residual solids. *If excavation to three feet below the residual solids has not achieved the confirmation requirement then samples will be analyzed for arsenic and beryllium (the constituents of concern from a risk perspective) to document conditions at the base of the excavation before the area is regraded and covered.*

### 3.3 Regrading

Simplot is considering construction of a new lined pond in this area in the near future. To accommodate this construction the east dewatering pit may not be completely backfilled following removal. Once excavation activities have been completed, the gravel and soil berms surrounding the pits will be used as backfill and the area will be regraded to establish a final grade consistent with the surrounding terrain as indicated on Drawing 0121C-104, to promote positive drainage. There will be no compaction requirements for the backfill placed into the pits, however the material shall be placed in lifts no greater than twelve inches and nominally compacted by the placement equipment.

Because of the potential construction of a new lined pond in this area, vegetation establishment will not be performed immediately following remediation. However, as a contingency, Simplot will develop a vegetation plan for the Dewatering Pit area if a construction schedule for the new pond has not been established by twelve months after the Dewatering Pit remediation is complete.

## 4.0 REMEDIAL ACTION PLAN

This section provides a detailed plan of action for completing the Dewatering Pit remedial action and fulfills the requirements of the Remedial Action Work Plan, as described in the Consent Decree Statement of Work for the Simplot Plant Area. As discussed in Section 3.0, construction drawings and specifications are included as Appendices A and B, respectively. The proposed construction schedule and necessary quality control and quality assurance activities are also addressed in this section.

### 4.1 Proposed Schedule And Schedule Considerations

The proposed project schedule is shown on Figure 1. Construction/removal activities are anticipated to begin within approximately 45 days of the approval of this RDR/RAWP document. It is estimated that excavation and relocation of the pit solids will take approximately 2 weeks to complete. Confirmation samples will be collected immediately after removal of the pit solids and shipped to the laboratory with a requested 24-hour turn around. If necessary, any additional removals could likely be completed within one week of receiving the initial analytical results, and a second round of confirmation sampling would follow these removals. This cycle would continue until analytical confirmation is achieved. However, for planning purposes, it is assumed that no more than one supplemental excavation effort will be required. After the removals are confirmed, site restoration could be completed within several days and the prefinal inspection would be performed. Any corrective actions identified by the inspection would likely be completed within one week and would be followed by the final inspection. A Construction Completion Report would then be issued within thirty days of the final inspection.

The Don Plant is an operating industrial facility. The Dewatering Pit is in a peripheral portion of the facility across U.S. Highway 30 from the main plant and adjacent to several holding ponds (see Drawing 0121C-102). Because the Don Plant is an operating industrial facility, excavation/grading activities and transportation of excavated materials to the gypsum stack will be planned and scheduled to minimize any impacts on facility operations. However, Dewatering pit remediation will be scheduled to avoid the annual facility turnaround period, when intensive maintenance activities occur which may result in access difficulties through the main Don Plant area. In addition, the effect of seasonal conditions on site

access and soil excavation activities will be considered to avoid periods when the ground may be frozen or excessively wet conditions may make excavation and transportation activities difficult. Placement of material on the gypsum stack will be performed in a manner to avoid interference with stack building and maintenance operations.

#### **4.2 Mobilization And Site Preparation**

Following approval of the RDR/RAWP by the EPA, a contractor will be selected to perform the removal activities. After selection of a contractor and award of the contract, mobilization and site preparation will begin. Upon receipt of Simplot's notice to proceed, the contractor will mobilize personnel, equipment and materials to the site. Prior to the initiation of excavation activities, utilities in and around the work area will be located. Care will be taken to identify possible underground and overhead hazards. Portable sanitation facilities will be provided for on-site personnel at the work area. Simplot maintains access control to the Dewatering Pit area by fencing and a secure gate. Additional site security for the remedial action is not anticipated.

#### **4.3 Excavation And Loading Of Dewatering Pit Solids**

Prior to the initiation of excavation activities, access to the pit solids will be gained by modifying the berm on the south side of each pit to create access ramps into each excavation area. The residual solids will be excavated from the designated areas and loaded into trucks for transport to the gypsum stack. To minimize the tracking of the residual solids, trucks will be routed and spotted for loading in locations around the perimeter of the pits to avoid driving across or through the material to be removed. The quantity of material removed from the Dewatering Pits will be established by tracking the number of trucks loaded and transported to the gypsum stack. This estimated quantity will be included in the construction completion report.

Trucks will be loaded with sufficient freeboard to prevent spilling of materials and covered during transportation. Materials that collect on end-gates, and sideboards during the truck loading process will be

removed by brushing and sweeping. Collected soil will be loaded into the trucks for placement with the residues.

Suitable personal protective equipment (PPE) will be used to ensure worker safety during the Dewatering Pit removals. Specific details regarding the use of PPE and site safety procedures will be provided in the Construction Health and Safety Plan.

#### **4.4 Transportation And Disposal Of Dewatering Pit Solids**

Excavated material will be transported across Highway 30, onto the main Don Plant site, and to the southwestern corner of the lower gypsum stack, as shown on Drawing 0121C-102. During the transport phase of the work, the contractor will provide traffic controls and/or appropriate signage, as necessary or required by state or local regulations, at the entrance onto Highway 30. The solids will be placed on the gypsum stack in an area compatible with the Simplot operations on the stack at the time of the work. All traffic associated with the Dewatering Pit removal will be subject to the Don Plant safety rules for vehicle movement at the facility.

Visual evaluations of fugitive dust emissions will be assessed and additional dust control will be implemented during transport and unloading of the pit solids as described in Section 4.5. In addition, excavation, loading and hauling activities will be immediately suspended if high winds or other conditions result in extreme dust emissions from the remedial action activities that are beyond Simplot's Control. If such conditions occur, Simplot will take immediate action to control the remediation-related source of the dust emissions through water application.

As the Dewatering Pit solids are not classified as hazardous wastes (see Section 2.2) and they are not being transported off-site, no special transportation or manifesting requirements will be necessary.

#### 4.5 Environmental Inspections and Controls

Excavation activities will be conducted in a manner to minimize the potential for off-site contamination via water or wind erosion. Where necessary, stormwater run-on will be diverted away from the work area. Because the excavation activities will be performed within the depressed ponds of the Dewatering Pit area, stormwater run-off will be naturally controlled without the need for sediment control devices/structures.

During construction, fugitive dust will be controlled through the use of water sprays and the covering of trucks. In addition, voluntary dust monitoring will be performed following a two-step process. The first step will consist of observing the excavation and loading activities and highway crossing activities, in accordance with EPA Method 22 – Visual Determination of Fugitive Dust Emissions, to determine the frequency of visible dust emissions. If visible emissions are observed for more than 45 seconds in a 15 minute observation period (frequency ratio is equivalent to the 3 minutes per 60 minute period) follow-up monitoring will be performed, in accordance with EPA Method 9 – Visual Determination of the Opacity of Emissions from Stationary Sources, to quantify the opacity of the fugitive emissions. Dust monitoring will be performed once daily at the excavation and loading point and at the highway crossing. The Method 22 observation will be performed by an individual knowledgeable in the procedures for determining opacity levels. The Method 9 observations will be performed by a certified Method 9 observer. Copies of the Method 9 and Method 22 procedures are included in Appendix E. Results of these monitoring activities will be recorded on the observation forms contained in each method.

If any Method 9 observation exceeds 20% opacity, Simplot will immediately halt the associated activity and increase the frequency of water application to the work area to control dust until the visible dust opacity is consistently maintained below 20% as verified by two consecutive Method 9 observations. Once this criterion has been achieved, activities will resume and two Method 22 observations (with follow-up Method 9 observations, if necessary) will be performed in the next hour following resumption of activities.

Dust control activities will be performed on an ongoing basis with the goal of minimizing visible dust emissions from the work site. Perimeter and excavation area watering will be continuously available

and utilized as necessary to control off-site migration of contaminants via wind dispersion. Haul roads will be wetted hourly or as otherwise necessary to minimize dust emissions. Wetting will be performed in a manner so as not to saturate the soils. A gravel pad may also be constructed at the exit from the work area to Highway 30 to minimize tracking of materials onto the highway and to minimize dust.

#### **4.6 Site Restoration**

Site restoration activities will be implemented upon completion of excavation and confirmation sampling. These activities will include backfilling the pits using the berm material surrounding the pits and grading the area to match the surrounding existing grade and to promote positive drainage.

## 5.0 CONSTRUCTION MANAGEMENT PLAN

The remediation of the Dewatering Pit will be conducted generally as described in Section 4.0 of this report. This section presents an overview of the construction inspection and management procedures including a brief discussion of project roles and responsibilities.

### 5.1 Management Of Remedial Actions

The J.R. Simplot Company has overall responsibility for the completion of the Dewatering Pit remedial action. Mr. Ward Wolleson of Simplot is the project manager and will act as the Remedial Action Coordinator for this work (see Figure 1). In this role, Mr. Wolleson will be responsible for representing the interests of Simplot and ensuring that the project objectives are met within the framework of the Consent Decree and Statement of Work. MFG, Inc., on behalf of Simplot, is responsible for the development of the Remedial Design and Remedial Action planning. Simplot's representative on-site during construction will be Mr. Dale Reavis, P.E. The on-site representative will be responsible for overall supervision of the remedial action construction including identifying and documenting non-conformances and corrective actions. Simplot will designate a field supervisor to perform day to day management of the remedial action construction activities. The field supervisor will be responsible for overseeing and documenting the contractor's operations, for documenting and performing visual observations, and ensuring the performance of all necessary quality control and quality assurance activities. Ms. Jeanene Benson, Environmental Specialist, of the J.R. Simplot Company, will collect the confirmation samples. Data validation and data assessment will be performed by Ms. Cathy Shuggarts of MFG, Inc. Samples will be analyzed by SVL Analytical, located in Kellogg, Idaho. Mr. Paul E. Duerksen, the Quality Assurance Coordinator, will be responsible for oversight of the analyses. The U.S. Environmental Protection Agency (EPA) is the lead agency on the project and will be providing oversight of the RD/RA activities including document review and acceptance and oversight of field activities, as necessary. Ms. Linda Meyer is EPA's Remedial Project Manager and primary EPA contact.

The objective of the construction management activities is to ensure compliance with the approved project plans. The detailed plan for completing the RA activities, or RA Work Plan, is presented in

Section 4.0 of this document. Although no significant changes are envisioned, material changes in the scope of work or procedures for the implementation of the work may be necessitated by currently unforeseen conditions. If this occurs, change management procedures will be initiated to facilitate the modification to the RA program and gain EPA approval. Proposed or necessitated changes will be presented in writing to the EPA for review and approval. This change request will identify: the problem or situation that the change arose from; describe in detail the recommended change or modification suggested as a solution; and present an evaluation of the impact to the attainment of performance standards or schedule, if any. No deviations from the approved plans will proceed without approval of the EPA. Minor changes in the sequencing, site layout, or remediation procedures not in conflict with the intent of the project plans and specifications will be documented by the on-site representative and reported to the EPA's project manager, but will not require the initiation of formal change management procedures.

## **5.2 Confirmation Sampling**

Field methods for collection of confirmation samples are described in this section along with a listing of the laboratory methods that will be used.

### **5.2.1 Sample Collection**

This section provides details of how samples will be collected.

#### *Equipment*

The following equipment will be required for sample collection:

- Collection Containers – contaminant-free glass containers obtained from the analytical laboratory;
- Stainless Steel Spade and Scoopula – for sample collection;
- Stainless Steel Compositing Bowl – for collecting grab samples for compositing. Samples will be mixed in this bowl;

- Latex Gloves – for personal protection and to prevent cross-contamination of samples (disposable, powderless);
- Field notebook – a bound book used to record progress of sampling effort and record any problems and field observations during sampling;
- Permanent marking pen – used as needed during sampling and for documentation of field logbooks and data sheets;
- Kite string and stakes – for marking sampling sectors within each pit;
- Measuring tape or wheel – used in defining the sampling sectors within each pit; and
- Trash bag – used to dispose of gloves and wipes.

Following the removal of the pit solids, as described in Section 3.1, composite samples of the underlying soil will be collected for arsenic and beryllium analyses. Confirmation soil samples will be collected for laboratory analysis of arsenic and beryllium by inductively coupled plasma emission spectrometry (ICP), EPA Method 6010B. For the larger eastern and western pits, the excavated area will be divided into four approximately equal sectors and composite samples will be collected from each sector. For the smaller southern pit only one composite sample will be collected. Each composite sample will comprise of four discrete subsamples collected at randomly selected locations within each sector. Each subsample shall consist of soil uniformly collected from the 0" to 6" depth interval. Subsamples will be collected using a decontaminated spade and scoopula and placed directly into a decontaminated stainless steel compositing bowl and homogenized by hand blending to a uniform consistency. A sample volume of at least 16 ounces of the homogenized composite sample will be placed in a precleaned collection container supplied by the laboratory.

Immediately following sample collection, samples will be labeled and prepared for shipment to the analytical laboratory in accordance with MFG Standard Operating Procedure SOP No. 2 (Appendix C). Each sample will be assigned a unique sampling identification number. Sample identification numbers will have several components, as explained using the following example:

EMF – DWP – 1002 – W1 – A

The first component, EMF, stands for “Eastern Michaud Flats” and indicates that samples were being collected as part of the Superfund Project; “DWP” stands for Dewatering Pit; “1002” is the month

and year the samples were collected, W1 indicates that the sample was the first sample from the west pit (“S” and “E” will be used for the south and east pits respectively); and A indicates it was the first sample from this location (B or C will be used if additional samples are required following re excavation).

Field activities will be documented in accordance with SOP No. 1 (Appendix C). Sample preservation requirements are shown on Table 3.

### 5.2.2 Laboratory Analysis

Analyses will be performed by SVL Analytical Inc. in Kellogg, Idaho. The analytes, laboratory methods, and preservation requirements are listed on Table 3.

**Table 3**

**Analytical Methods, Estimated Samples, Sample Preservation and Holding Times**

Parameter	Analytical Method	Estimated Number of Samples *	Target Method Detection Limit (MDL) mg/Kg	Preservation and Storage Requirements	Holding Time (days)
Arsenic	EPA 3050/6010B	9	1.0	4 ± 2 °C	180
Beryllium	EPA 3050/6010B	9	0.2	4 ± 2 °C	180

\* The estimated number of samples is based on collection of four confirmation samples from the eastern and western pits and one sample from the southern pit. Additional samples may be required based on the analytical results for these samples.

If sampling equipment is to be re-used, the decontamination procedures outlined in the Standard Operating Procedures (SOP No. 16; Appendix C) will be followed. There is no need to decontaminate between locations for subsamples collected for a single composited sample.

### 5.3 Quality Control And Quality Assurance

This section describes the general quality control and quality assurance procedures to be implemented by the construction management team to ensure that the environmental sampling and construction comply with the project performance requirements. Quality control refers to the procedures,

methods and tests utilized by the construction contractor to achieve compliance with the plans and specifications, and quality assurance refers to the site inspection, checks and tests performed by the management team to ensure that the substantive requirements of the plans and specifications are met.

### **5.3.1 Environmental (Confirmation) Sampling**

The procedures listed in this section will be used during collection and analysis of confirmation samples to ensure that the data are of appropriate quality to meet the data needs of this plan.

#### *Data Uses*

As noted in Section 3.2, the data resulting from this sampling will be used to confirm that the Dewatering Pit solids have been removed. This will be achieved by analytical testing of the underlying soil and comparing the metals concentrations with the removal confirmation levels.

#### *Field Quality Control Procedures*

Field quality control will entail decontamination of field sampling equipment and adherence to this plan and SOP Nos. 1, 2, and 16 (Appendix C). These elements are described in Section 5.2.1.

#### *Laboratory Quality Control Procedures*

The sample collection methods and analytical methods were selected to ensure that laboratory analysis is sufficiently sensitive, accurate and precise, and will generate data that are representative and comparable, as necessary, to meet the data needs for this plan. The commercial laboratory used to provide the analyses listed on Table 3 will perform the requested analyses in accordance with the referenced EPA methods and will operate under an internal Quality Assurance Plan (attached as Appendix D). The laboratory will provide the following information to support their analysis results for each parameter analyzed:

- Sample preparation method reference;
- Analytical method reference;
- Method detection limit;
- Reporting or practical quantitation limit;
- Units;
- Shipment temperature;
- Analysis data;
- Laboratory control standard recovery;
- Matrix spike (MS) recovery;
- Matrix spike duplicate (MSD) recovery;
- MS/MSD relative percent difference;
- Initial and continuing calibration verification results (dated);
- Chain of custody record; and
- Sample condition upon receipt.

The accuracy of laboratory analysis results will be evaluated using the results for recovery from laboratory control samples (LCSs) and MS samples. The precision of laboratory analyses will be evaluated using results from duplicate analyses of MS samples. Representativeness will be evaluated by confirming the proper analytical method is used and the sample holding times are met. Comparability will be achieved through use of standard techniques to analyze the samples and reporting of the results in appropriate units. Criteria for acceptance of laboratory data for specific data uses are shown in Table 4.

**Table 4**  
**Laboratory Control Limits**

<b>Metal</b>	<b>Soil LCS</b>	<b>CCV</b>	<b>Method Blank</b>	<b>Soil Matrix Spike</b>	<b>Relative Percent Difference</b>
Arsenic	±20%	±10%	<1.0 mg/Kg	±25%	±20%
Beryllium	±20%	±10%	<0.2 mg/Kg	±25%	±20%

*Project Documentation*

A field log will be maintained to record sample collection activities. Whenever a sample is collected or a measurement is made, a detailed description of the sample location and any additional observations will be recorded. The following minimum information will be recorded:

- Site location and sample collection locations;
- The name(s) of the sampling personnel;
- Time and date of the collection event;
- Prevailing weather conditions; and
- Sampling or analyses problems.

*Data Reduction and Validation*

The analytical laboratory will report data by paper copy. Laboratory reports and associated field documentation will be copied and filed. The data will be evaluated in accordance with SOP No. 20 (Appendix C). The QA objectives are shown in Table 5.

**Table 5**  
**Quantitative Measurement Objectives**

<b>Parameter</b>	<b>Objective</b>
Accuracy	LCS Recovery = 80 to 120% MS Recovery = 70 to 130%
Precision	LCS Duplicate RPD < 25% MS Duplicate RPD < 25%
Completeness	95%

In general, the following steps will be taken to review the monitoring data:

- Chain of Custody forms and laboratory data sheets will be checked to verify that samples were analyzed within specific holding times. Samples which do not satisfy holding time and preservation requirements will be noted and the reliability of the data assessed.
- The accuracy of chemical data will be evaluated using results from LCS and MS samples prepared by the laboratory. The laboratory will calculate the percent recoveries for these results. If the recoveries are outside the limits presented in this plan, action will be taken by the laboratory to improve the precision of analytical results.
- Finally, all the data will be carefully reviewed for potential transcription errors, detection limit discrepancies (laboratory only), data omissions, and suspect or anomalous values. If such errors or deficiencies are found, the laboratory and/or field sampler will be contacted and the appropriate corrective action taken. The purpose of contacting the field sampler would be to check for the origination of transcript errors or data omissions. The corrective action will be recommended by the data reviewer and approved by the Simplot Field Manager (Dale Reavis). The action will be subject to Agency review and comment.

The data will be reviewed to confirm that the data meet the data quality objectives for data use. Any data not meeting the quality requirements of this plan will be flagged to identify them to data users and appropriately qualified. A list of data qualifiers is shown on Table 6.

**Table 6**  
**Qualifier Flag Definitions**

FLAGS	DESCRIPTION
J	Analyte was present but reported value may not be accurate or precise
J +	Analyte was present but reported value may not be accurate or precise and there may be a high bias in the value reported (actual concentration may be lower than the reported result)
J -	Analyte was present but reported value may not be accurate or precise and there may be a low bias in the value reported (actual concentration may be higher than the reported result)
R	Data point has been rejected
U	This analyte was analyzed for but not detected at the specified detectability limit
UJ	This analyte was analyzed for but not detected, and the reported detectability limit is estimated

### 5.3.2 Construction

The primary quality control procedure to be utilized by the construction contractor is the use of adequately skilled personnel for the work being performed. Construction surveys will also be performed, as needed, to verify the depth of any additional excavation (beyond that guided by visual observation) and to ensure that the final regraded surface is in accordance with design requirements. The Contractor will also be required to cooperate with the on-site representative in collecting confirmation sampling and other quality assurance activities.

Construction quality assurance procedures will primarily involve field inspections of the remediation project by the on-site representative. All procedures, materials, and equipment used in the construction will be observed and monitored by the on-site representative on a daily basis. Work elements that are not in compliance with the plans and specifications will be reworked by the contractor so that the element is in compliance. All quality control data supplied by the contractor will be documented by the on-site representative to allow complete project tracking of all components of the construction.

### 5.4 Construction Reporting

The field supervisor responsible for overseeing the remedial action construction activities will keep a daily log, or complete a daily report, documenting the following information:

- Date;
- Weather conditions;
- Start and stop times;
- Names of people working and tasks performed by each;
- Number and approximate size of loads of material removed;
- Location of dumped loads on the gypsum stack;
- Fugitive Dust Observation Forms (Methods 22 & 9); and
- Any other item the field supervisor feels is appropriate to include in the log.

In accordance with the requirements of the Consent Decree and Statement of Work, monthly progress reports will be submitted to the EPA to provide a status of activities being conducted within the Simplot Plant Area. A section of this report will be dedicated to reporting on the progress of Dewatering Pit activities, as appropriate.

Upon substantial completion of Dewatering Pit remedial activities, the EPA will be notified for the purpose of conducting a Prefinal Construction Inspection, which will consist of a walk-through inspection. If outstanding construction items are discovered during the inspection, a Prefinal Construction Inspection Report will be submitted, including details of outstanding construction items, actions performed to resolve the items, completion date and an anticipated date for the final inspection. The final construction inspection will evaluate items identified in the prefinal inspection. Within 30 days of the Final Construction Inspection, a Construction Completion Report will be submitted. This report will include descriptions of the remedial activities, field records and as-built drawings. This report will include a description of the project organization, the construction sequence, equipment and personnel used during remedial activities, a description of design changes/field changes/change orders, a summary of all QA/QC testing, surveying and final project quantities. The final as-built drawings and certification report will be signed and stamped by an Idaho-registered Professional Engineer.

## **5.5 Construction Health And Safety Control**

A Construction Health and Safety Plan will be prepared and submitted to the EPA under separate cover. This plan will detail the minimum health and safety requirements to be adhered to during the performance of remedial action activities. The construction contractor will be responsible for the health and safety of their construction crews and personnel during on-site activities. The Simplot on-site representative will be responsible for providing guidance and inspection to ensure that proper procedures are followed for health and safety of the public and visitors to the site during construction activities.

## 6.0 OPERATION AND MAINTENANCE

No Operations and Maintenance activities will be required for remedial actions at the Dewatering Pit. The performance standard for this work will be achieved by removal of the residual solids.

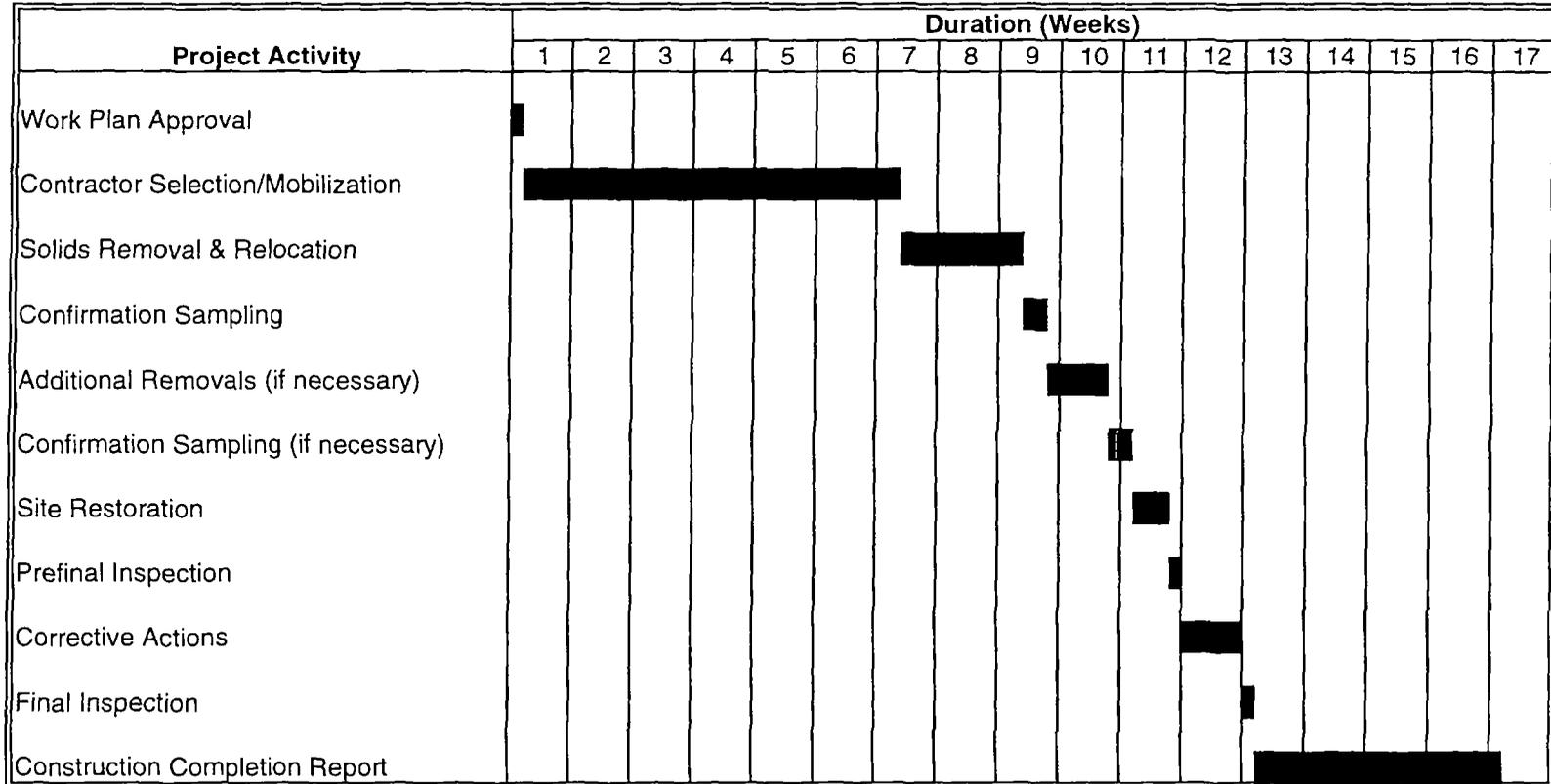
## 7.0 REFERENCES

- Bechtel. 1996. *Remedial Investigation Report for the Eastern Michaud Flats Superfund Site*. Bechtel Environmental, Inc. Prepared for FMC Corporation and the J.R. Simplot Company.
- Ecology and Environment Inc., 1996. *Baseline Human Health Risk Assessment. Eastern Michaud Flats Superfund Site*. Prepared for EPA.
- Simplot, 2002. *Dewatering Pit Sampling and Analysis Plan to Support Remedial Design Simplot Plant Area Eastern Michaud Flats Superfund Site*. Prepared by MFG, Inc.
- USEPA. 1998. *Record of Decision, Declaration Decision Summary and Responsiveness Summary for Eastern Michaud Flats Superfund Site*. Pocatello, Idaho, US EPA Region 10. June 1998.
- USEPA. 2002. *Consent Decree for Remedial Design/Remedial Action for the Simplot Plant Area at the Eastern Michaud Flats Superfund Site*. US EPA Region 10. May 9 2002.

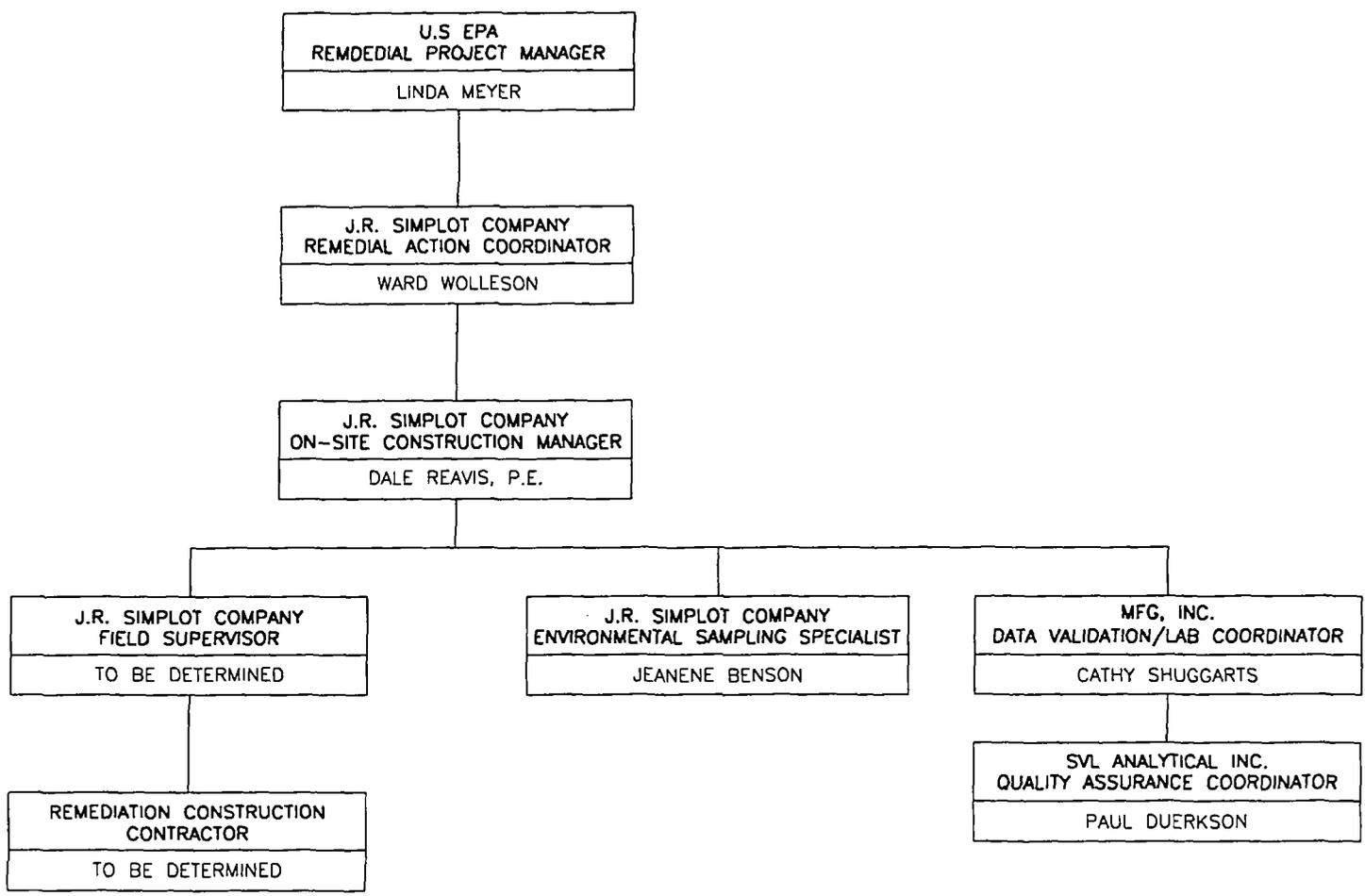
## FIGURES

**FIGURES**

**Figure 1  
Proposed Project Schedule**



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<b>SIMPLOT PLANT AREA EASTERN MICHAUD FLATS SUPERFUND SITE POCATELLO, IDAHO</b>	
DEWATERING PIT	
FIGURE 2	
<b>PROJECT ORGANIZATION CHART</b>	
PROJECT: 010121.4	DATE: NOVEMBER 2002
REV:	BY: SCG CHECKED: ACK
<b>MFG, Inc.</b> <i>consulting scientists and engineers</i>	

## APPENDIX A

**APPENDIX A**  
**Construction Drawings**

# EASTERN MICHAUD FLATS SUPERFUND SITE

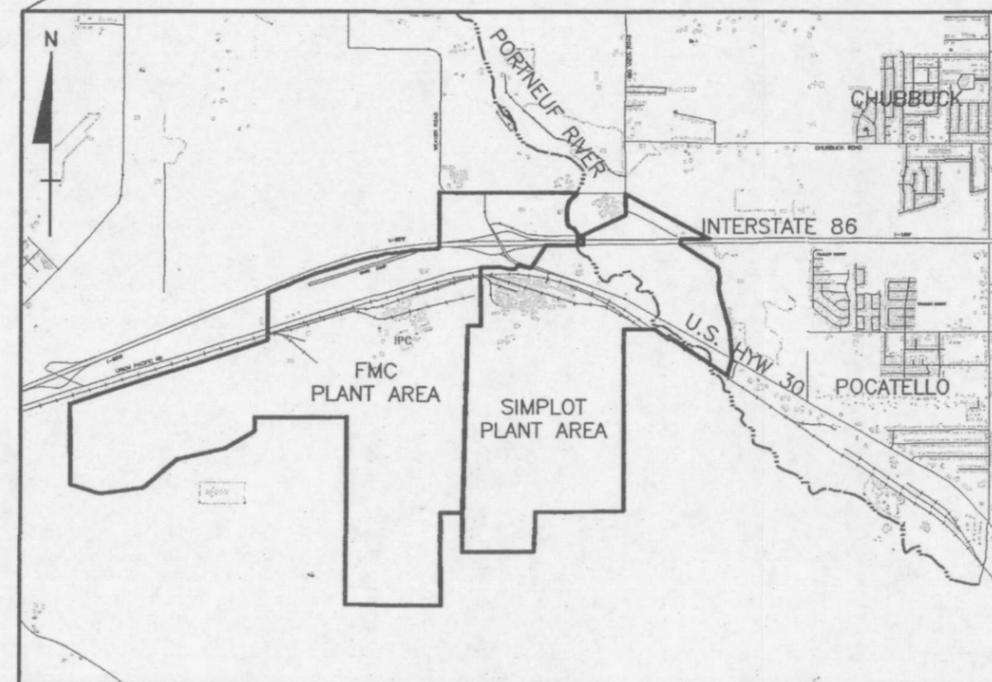
POCATELLO, IDAHO

## SIMPLOT PLANT AREA DEWATERING PIT SOLIDS REMOVAL PROJECT

**DRAFT**  
Not For Construction



**IDAHO**  
Location Map



**VICINITY MAP**  
SCALE  
0.5 0 0.5 MILE

SHEET TITLE

SHEET NO.

LOCATION & VICINITY MAPS & TITLE SHEET -----	0121C-101
DEWATERING PIT SITE PLAN AND HAUL ROUTE -----	0121C-102
DEWATERING PIT EXCAVATION PLAN -----	0121C-103
DEWATERING PIT REGRADING PLAN -----	0121C-104



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**REFERENCE**

NO.	REVISIONS	BY	DATE
1	ISSUE FOR REVIEW	DLL	05/02

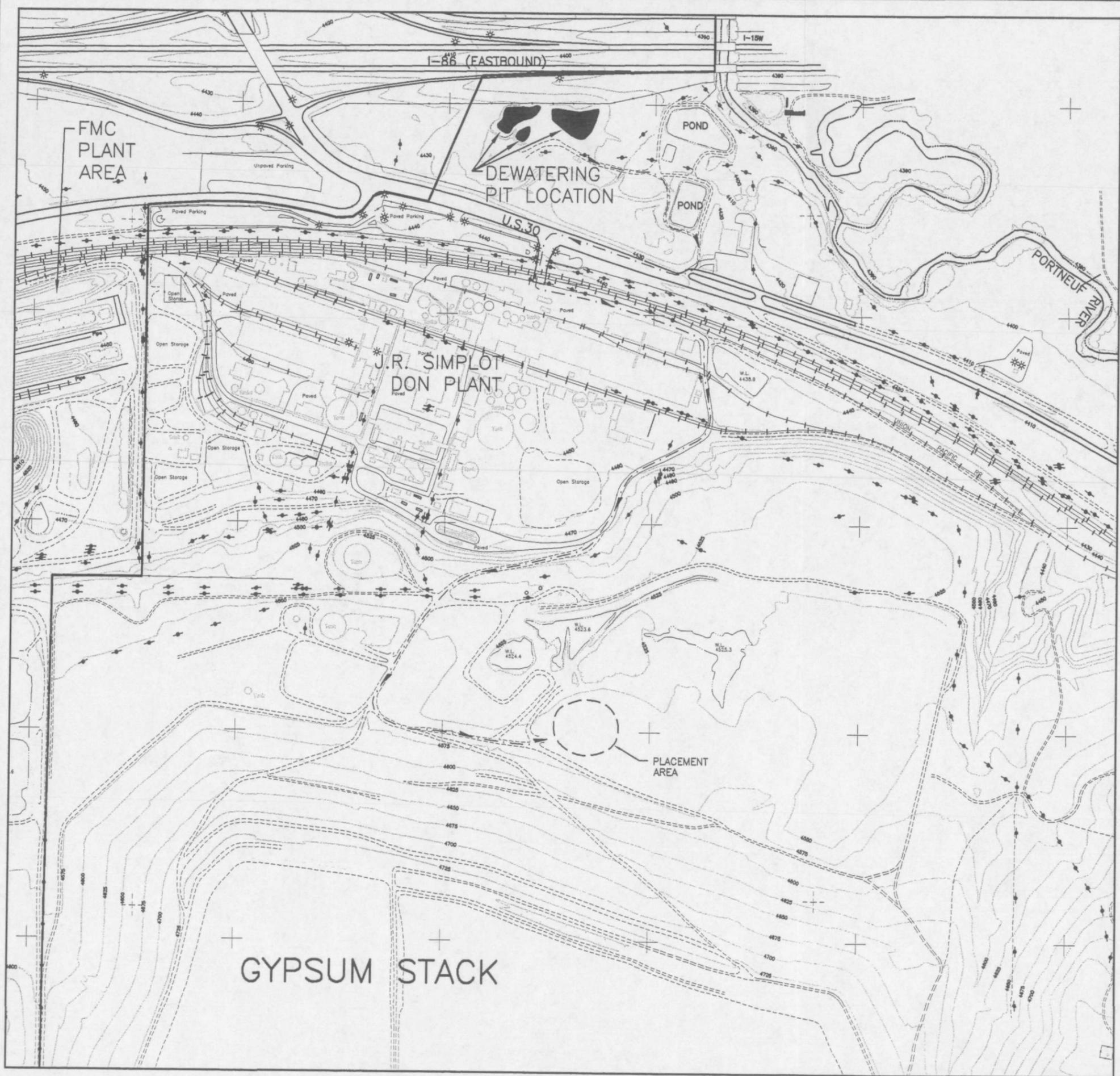
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DRAWN BY: SCG  
CHECKED BY: ACK  
APPROVED BY: DLL  
CTB: MFG-STD  
VIEW NAME: PLAN  
ORIGINATION DATE: 05/21/02  
PLOT SCALE: 1:1 OR 1:2  
DATE: MAY 2002

**EASTERN MICHAUD FLATS  
POCATELLO, IDAHO  
SIMPLOT PLANT AREA  
DEWATERING PIT REMEDIAL ACTION**

**LOCATION &  
VICINITY MAPS  
& TITLE SHEET**

DRAWING NO. **0121C-101** REV. NO. **0**  
SHEET **1** OF **4**

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 Images: [none]  
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 Plot date: 11/15/02



**LEGEND:**

- DEWATERING PIT
- HAUL ROUTE TO GYPSUM STACK
- PLACEMENT AREA

**NOTES:**

1. CONTRACTOR MUST COMPLY WITH ALL SIMPLOT TRAFFIC AND SAFETY RULES AND REGULATIONS WHEN TRAVELING THROUGH THE DON PLANT.
2. ALL HAUL TRAFFIC MUST BE CONFINED TO DESIGNATED HAUL ROUTES.
3. EXACT PLACEMENT AREA OR DUMPING SITE WILL BE DESIGNATED BY SIMPLOT OPERATIONS PERSONNEL.
4. CONTRACTOR SHALL PROVIDE TRAFFIC CONTROL AND/OR APPROPRIATE SIGNAGE, AS NECESSARY, AT ENTRANCE TO HIGHWAY 30.

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— BECHTEL ENVIRONMENTAL, INC., DATE OF PHOTOGRAPHY: 21JUNE92 DATE OF MAPPING: AUGUST 92 MAPPING AND PHOTOGRAPHY BY WALKER AND ASSOCIATES, INC. SEATTLE, WASHINGTON, SEATTLE, WASHINGTON

NO.	REVISIONS	BY	DATE
0	ISSUE FOR REVIEW	DLL	05/02

DESIGNED BY:	DLL
DRAWN BY:	SCG
CHECKED BY:	ACK
APPROVED BY:	DLL
CTB:	MFG-STD
VIEW NAME:	PLAN
ORIGINATION DATE:	04/29/02
PLOT SCALE:	1:1 OR 1:2
DATE:	MAY 2001

**EASTERN MICHAUD FLATS  
POCATELLO, IDAHO  
SIMPLOT PLANT AREA  
DEWATERING PIT REMEDIAL ACTION**

**DEWATERING PIT  
SITE PLAN AND  
HAUL ROUTE**

DRAWING NO.	REV. NO.
<b>0121C-102</b>	
SHEET <b>2</b> OF <b>4</b>	

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**LEGEND:**

 APPROXIMATE AREA OF PHOSPHATE ORE RESIDUALS

**NOTES:**

1. CONTRACTOR SHALL BE RESPONSIBLE FOR ALL UTILITY LOCATES PRIOR TO EXCAVATION.
2. REMOVE ALL VISUALLY IDENTIFIABLE ORE RESIDUALS FROM AREAS INDICATED.
3. COOPERATE WITH AND ASSIST ENGINEER OR OWNER'S REPRESENTATIVE IN THE COLLECTION OF SOIL SAMPLES FOLLOWING REMOVAL.
4. AVOID DISTURBANCE OF EXISTING VEGETATION TO EXTENT PRACTICAL.

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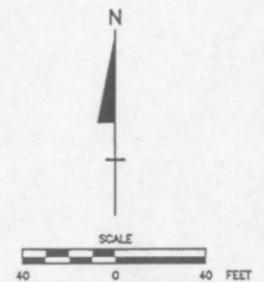
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1	ISSUE FOR REVIEW	DLL	05/02

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 DATE: MAY 2002

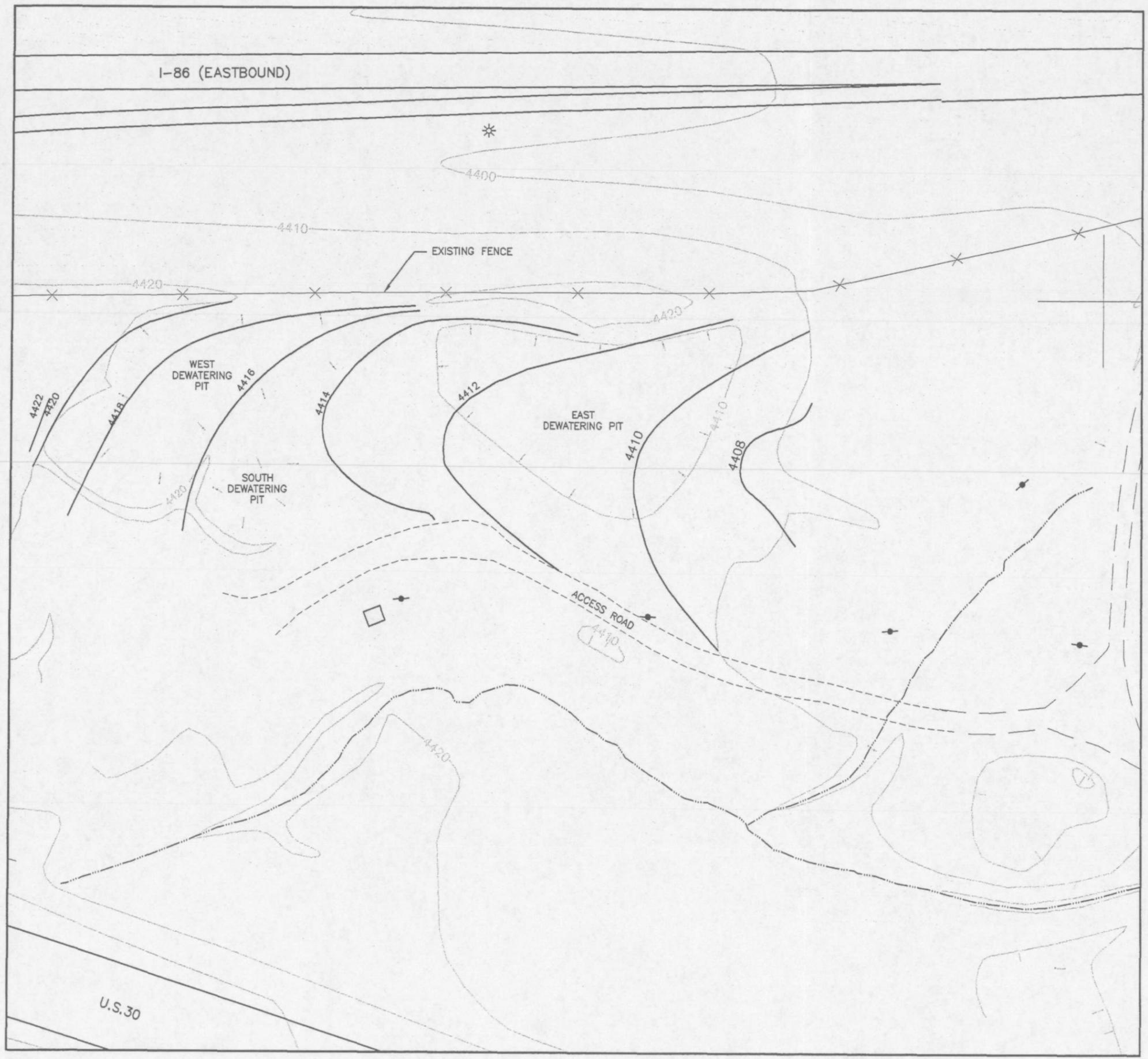
**EASTERN MICHAUD FLATS  
POCATELLO, IDAHO**  
SIMPLOT PLANT AREA  
DEWATERING PIT REMEDIAL ACTION

**DEWATERING PIT  
EXCAVATION PLAN**

DRAWING NO. **0121C-103** REV. NO. **3**  
 SHEET **3** OF **4**



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- LEGEND:**
- POWER POLE
  - EXISTING INDEX AND INTERMEDIATE CONTOURS
  - PROPOSED REGRADED CONTOURS

- NOTES:**
1. FOLLOWING REMOVAL AND SATISFACTORY RESULTS OF CONFIRMATION SAMPLING BACKFILL PITS USING SURROUNDING BERM MATERIAL.
  2. BACKFILL AND REGRADE AREA TO PROMOTE POSITIVE DRAINAGE AND AVOID PONDING.
  3. INSTALL SEDIMENT CONTROL IN THE FORM OF SILT FENCE AND/OR STRAW BALES TO MINIMIZE TRANSPORT OF SEDIMENT.

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NO.	REVISIONS	BY	DATE
1	ISSUE FOR REVIEW	DLL	05/02

DESIGNED BY: DLL  
 DRAWN BY: SCG  
 CHECKED BY: ACK  
 APPROVED BY: DLL  
 CTB: MFG-STD  
 VIEW NAME: PLAN  
 ORIGINATION DATE: 04/29/02  
 PLOT SCALE: 1:1 OR 1:2  
 DATE: MAY 2002

**EASTERN MICHAUD FLATS  
POCATELLO, IDAHO**  
SIMPLOT PLANT AREA  
DEWATERING PIT REMEDIAL ACTION

**DEWATERING PIT  
REGRAIDING PLAN**

DRAWING NO. **0121C-104** REV. NO. **4**  
 SHEET **4** OF **4**

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## APPENDIX B

**APPENDIX B**

**Contractor Statement of Work/Specifications**

**SIMPLOT PLANT AREA  
DEWATERING PIT SOLIDS REMOVAL PROJECT  
POCATELLO, IDAHO**

**STATEMENT OF WORK / PROJECT SPECIFICATIONS**

**A. Background Information**

The Eastern Michaud Flats (EMF) Superfund Site Dewatering Pit Solids Removal Project consists of removal and disposal of residual solids from the Dewatering Pit located between Highway 30 and Interstate 86. The dewatering pit was briefly used by Simplot to contain excess phosphate ore from the start-up period for the ore slurry pipeline and periodically since that time for pH adjustment of irrigation waters. Analytical testing of the pit solids has confirmed they are non-hazardous.

The Dewatering Pit consists of three bermed ponds. The total combined surface of these three ponds is approximately 41,750 square feet. In the West Dewatering Pit (Drawing 0121C-103) the depth of residual solids is approximately five inches deep in the middle and less deep toward the edges. In the East Dewatering Pit, the solids are approximately 12 to 14 inches deep in the middle of the pit. The South Dewatering Pit is a much smaller area and the residual solids are approximately half an inch deep or less. Using these measured depths and the pit surface areas, it is estimated that the pits contain approximately 1,500 cubic yards of solids.

Residual solids, visually distinct from the underlying native soil, are to be removed from the dewatering pits, hauled to, and placed on the Simplot Don Plant Gypsum Stack for disposal. Once excavation is complete, confirmation soil sampling will be conducted by Simplot to confirm that removal is complete. Following removal and confirmatory sampling the west and south pits will be regraded to match the existing topography. The east pit is to remain open to accommodate future construction in the area.

This project is being conducted by the J.R. Simplot Company, hereinafter referred to as the Owner, in accordance with a Remedial Action Work Plan prepared as directed under a Consent Decree between Simplot and the US Environmental Protection Agency.

**B. Supervision**

All work will be performed in the presence of an authorized representative of the Owner or designated Field Supervisor. The Field Supervisor will be the Owner's representative during construction to monitor the progress of construction and the quality of the work, and to record the data necessary to document the satisfactory completion of the project. The Field Supervisor will not be responsible for construction means, methods, techniques, sequences or procedures, or for the safety precautions and programs required for the work.

The Contractor shall maintain a competent staff at all times to supervise and perform the work. The Contractor shall maintain on the project during its progress, a competent supervisor, satisfactory to the Owner.

**C. Contractor Health & Safety**

The Contractor acknowledges that the residual solids in the Dewatering Pit area may contain elevated concentrations of metals and inorganic constituents, including arsenic, beryllium, fluoride, phosphorous, cadmium, chromium, vanadium and zinc. The available data for constituent concentrations in the solids and underlying soil are listed on Table 1. Constituent leaching and corrosivity data for the pit solids are listed on Table 2. Contractor shall prepare for and conduct all operations at the site in a manner to avoid risk of bodily harm to persons or damage to property and in full compliance with OSHA, the health and safety provisions of the contract documents, site-specific health and safety requirements of the Simplot Don Plant, and any and all other applicable authorities. Contractor shall prepare and submit a site specific Health and Safety Plan (HASP) that includes a construction safety program. The HASP shall be prepared in accordance with provisions in 29 CFR 1910.120, *Simplot Don Plant requirements and other federal, state and local regulations*. All contractor personnel on-site must comply with the training requirements of OSHA contained in 29 CFR 1910.120, *Hazardous Waste Operations and Emergency Response (HAZWOPER)*.

**D. Contractor Scope of Work**

Upon receipt of notice to proceed by owner, Contractor will mobilize personnel, equipment, and materials to the site. Contractor shall use an adequate number of skilled workers experienced in the type of work to be performed. Prior to the start of removal, contractor shall be solely responsible for locating utilities in

Dewatering Pit Solids Removal Project  
Statement of Work / Project Specifications

and around the work area. Care will be taken to identify all possible underground and overhead hazards. Contractor shall provide portable sanitation facilities for on-site personnel at the work area. Contractor shall keep the site free from any unnecessary accumulation of waste materials and rubbish and shall maintain the site in a safe and tidy condition at all times. Work activities are to be avoided at times when excavation and transportation activities may be hindered by frozen or excessively wet ground.

Removal activities will begin by modifying the berm on the south side of each of the three pits to create access ramps into each excavation area. Excavation is to proceed both vertically and laterally until there is a visible change in material type. The residual solids are gray in color, while the native soil is a light brown. All visible residual solids will be removed down to native soil. Contractor shall use excavation equipment having a smooth edge rather than teeth to allow efficient removal of the relatively thin solids and minimize mixing of the solids with the underlying native soils.

Material is to be loaded into trucks, covered, and transported to the gypsum stack. Trucks are to be routed and spotted for loading so as to minimize the tracking of residual solids from the dewatering pits. Load counts for each truck are to be submitted daily at the end of the day, or prior to the start of hauling the following day. Trucks are to be loaded with sufficient freeboard to prevent spilling of material during transportation. If material dries adequately to produce dust, the material shall be wetted prior to transportation to the gypsum stack. Any material that is spilled during loading or hauling is to be collected and managed with the remainder of the residual solids.

Excavated material is to be transported via Highway 30 to the lower gypsum stack at the Simplot Don Plant. All haul traffic must be confined to designated haul routes, as identified on the drawings, or as directed by the Field Supervisor. The contractor shall conduct its operations so as not to interfere with the normal flow of traffic on local roads near the site and must comply with all Simplot Don Plant traffic and safety rules and regulations when traveling through the plant. During hauling activities, contractor is to provide traffic control and/or appropriate signage at the entrance onto Highway 30, as necessary or required by state or local regulations. The solids will be placed on the southwestern corner of the lower gypsum stack at the direction of the Field Supervisor or Owner's representative. Contractor shall spread dumped material as directed by Field Supervisor or Owner's representative. Placement activities at the gypsum stack placement area shall be performed in a manner to avoid interference with stack building and maintenance operations.

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The Contractor is required to maintain a water truck on-site for dust control. Dust control activities are to be performed to minimize dust emissions from the site. Apply water, as necessary, to the excavation areas, perimeter work areas, and haul roads to minimize and control dust emissions. Dust control is to be performed so as not to saturate the soils. If necessary to prevent the tracking of mud onto the highway, the Contractor shall place a gravel pad at the entrance to Highway 30.

Contractor shall take all necessary precautions to limit disturbance to natural drainageways and existing vegetation in the vicinity of the work, and shall install temporary culverts, as required, to maintain drainageways during construction. Contractor shall control erosion along access roads and provide sedimentation control structures downstream of all work areas. Storm water run-on is to be diverted away from the work area and storm water run-off from disturbed work areas shall be controlled, as necessary, through the use of straw bales and/or silt fence to control erosion and sediment transport off-site.

Once the removal is complete the contractor is to assist the Field Supervisor or Owner's Representative with confirmation soil sampling. Confirmation soil samples will be collected from the zero to six inch depth interval in the underlying soils. Excavation of an additional 6-inches of soil and additional sampling will be required if the results of the confirmation sampling are not below the established confirmation value. Following the receipt of acceptable confirmation sampling results the pits will be backfilled using the berm material surrounding the pits to establish a final grade that matches the surrounding terrain as shown on the drawings. Place material in lifts not to exceed 12 inches, and nominally compact with the passage of equipment. Regrade area to promote positive drainage.

Following completion of the work, contractor shall thoroughly clean all equipment that has come into contact with the residual solids and remove from the site all equipment, materials and temporary facilities not incorporated into the work. Contractor shall leave all areas of the site in a clean, stable condition.

**Table 1**  
**Concentrations of Indicator Constituents in Dewatering Pit Solids and Underlying Soils**

East Pit		Sampling Depth (feet)				
Constituent	Background Levels (mg/kg) <sup>1</sup>	Surface	2.5	10	20	26
		Concentration (mg/kg)				
Arsenic	7.7	15	<3.3	<2.8	<2.3	<0.55
Beryllium	1.0	5.2	0.23	0.19	0.13	0.12
Cadmium	1.9	131	0.54	0.49	0.5	0.49
Chromium	27.5	2,710	16.3	30.9	31.1	8.9
Fluoride	600	30,000	710	550	320	140
Phosphorus	672	51,300	544	501	301	407
Zinc	52.8	3,610	35.8	37.2	24.8	25.3

Note:

1. Background constituent levels for site soils derived by EPA.

Table 2

Results of Toxicity Characteristic Leaching Procedure and Corrosivity Testing on Dewatering Pit Solids

Constituent/Property	Regulatory Level	West Pit	South Pit	East Pit
	mg/L or s.u.	mg/L or s.u.	mg/L or s.u.	mg/L or s.u.
Arsenic	5.0	0.035	0.026	0.073
Barium	100.0	0.0723	0.087	0.0535
Cadmium	1.0	0.102	0.0409	0.110
Chromium	5.0	<0.006	0.0284	0.0063
Mercury	0.2	<0.0002	<0.0002	<0.0002
Lead	5.0	0.0067	<0.005	0.0062
Selenium	1.0	0.029	0.022	0.053
Silver	5.0	<0.005	<0.005	<0.005
Corrosivity	<2	5.8	7.3	5.3

## APPENDIX C

**APPENDIX C**

**Standard Operating Procedures**

MFG, Inc.

**STANDARD OPERATING PROCEDURE No. 1**

**FIELD DOCUMENTATION**

**1.0 SCOPE AND APPLICABILITY**

This Standard Operating Procedure (SOP) describes the protocol for documenting field activities. MFG field personnel shall document field activities on formatted field records and other appropriate data sheets. These formatted record and data sheets will be part of the MFG project file; all forms must be filled out carefully and completely by one of the personnel actually performing the field activities.

**2.0 PROCEDURES**

**2.1 Daily Field Record**

The MFG field representative will prepare a Daily Field Record form (Figure SOP-1-1) for each day of field work. Documentation on the multiple-page form will include:

- A. Project identification;
- B. Date;
- C. Time on job (beginning and ending time);
- D. Weather conditions;
- E. Activity description;
- F. List of personnel and visitors on site;
- G. Safety equipment used and monitoring performed;
- H. Waste storage inventory (if any);

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- I. Chronological record of activities and events;
- J. Comments and variances from project work plan;
- K. Content of telephone conversations; and
- L. Signature of the MFG field representative.

The MFG field representative will document all details that would be necessary to recreate the day's activities and events at a later time, using as many additional sheets as necessary. The Daily Field Record also will be used to document field activities that may not be specified on other field record forms. Other activity-specific documentation requirements to be recorded on the Daily Field Record are discussed in the MFG Standard Operating Procedure for each activity.

### 3.0 DOCUMENTATION

#### 3.1 Field Record Forms

In addition to the Daily Field Record, MFG field personnel will complete specific MFG field record forms applicable to the field activities being conducted. The procedures for completion of activity-specific field record forms are presented in the applicable MFG Standard Operating Procedures. MFG field record forms include:

- Daily Field Record (SOP No. 1);
- Chain-of-Custody Record and Request for Analysis (SOP No. 2);
- Field Log of Borehole by Cuttings (SOP No. 4);
- Field Log of Borehole by Coring (SOP No. 4);
- UST Closure Field Record (SOP No. 3);
- Well Construction Summary (SOP No. 6);
- Well Development Record (SOP No. 7);

- Geophysical Log (SOP No. 5);
- *Water Level Monitoring Record* (SOP No. 11);
- Pumping Test Record (SOP No. 14);
- Eh Data Sheet (SOP No. 13);
- Groundwater Sampling Record (SOP No. 12); and
- Surface Water Sampling Record (SOP No. 12).

Additional field record forms and applicable procedures may be created for project-specific activities, as necessary.

### **3.2 Records Management**

All original field forms will be filed with the appropriate project's records.

## **4.0 QUALITY ASSURANCE**

### **4.1 Form Review and Filing**

All completed field forms will be reviewed by the Project Manager or project designated QA/QC reviewer. Any necessary corrections will be made in pen with a single-line strike out that is initialed and dated.

<b>DAILY FIELD RECORD</b>		DATE: _____	PAGE 1 of _____
Project No.: _____		Project Name: _____	
Location: _____	Time on Job: _____	AM PM	AM PM
Weather Conditions: _____			
Activity: _____			
<b>PERSONNEL ON SITE</b>			
Name	Company	Time In	Time Out
<b>VISITORS ON SITE</b>			
Name	Company/Agency	Time In	Time Out
<b>PERSONAL SAFETY</b>			
Protective Gloves	Hard Hat	Tyvek Coveralls (W/Y)	
Protective Boots	Safety Goggles/Glasses	Air Purifying Respirator	
Other Safety Equipment (describe): _____			
Monitoring Equipment: _____			
Field Calibration: _____			
<b>WASTE STORAGE INVENTORY</b>			
Container Type	Container ID	Description of Contents and Quantity	Location
Number of empty drums on Site: _____		Location of drums stored on Site: _____	
Signature of Field Representative: _____		Date: _____	
Notes: _____		 <b>MFG, Inc.</b> 4900 Pearl East Circle, Suite 300W Boulder, Colorado 80301-6118 (303) 447-1823 FAX: (303) 447-1836	

Revision 5/25/00

FIGURE SOP-1-1. DAILY FIELD RECORD



MFG, Inc.

STANDARD OPERATING PROCEDURE No. 2  
SAMPLE CUSTODY, PACKAGING AND SHIPMENT

1.0 SCOPE AND APPLICABILITY

This Standard Operating Procedure (SOP) describes the protocol to be followed for sample custody, packaging and shipment. The procedures presented herein are intended to be general in nature. If warranted, appropriate revisions may be made when approved in writing by the MFG Project Manager.

This SOP applies to any liquid or solid sample that is being transported by the sampler, a courier or an overnight delivery service.

2.0 PROCEDURES

The objectives of this packaging and shipping SOP are: to minimize the potential for sample *breakage, leakage or cross contamination*; to provide for preservation at the proper temperature; and to provide a clear record of sample custody from collection to analysis.

2.1 Packaging Materials

The following is a list of materials that will be needed to facilitate proper sample packaging:

- X Chain-of-Custody Record forms (see Figure SOP-2-1);
- X Coolers (insulated ice chests);
- X Transparent packaging tape;
- X Zip-lock type bags (note: this is used as a generic bag type, not a specific brand name);

- X Protective wrapping and packaging material;
- X Contained ice (packaged and sealed to prevent leakage when melted) or "Blue Ice";  
and
- X Chain-of-Custody seals.

## 2.2 Sample Custody from Field Collection to Laboratory

After samples have been collected, they will be maintained under chain-of-custody procedures. These procedures are used to document the transfer of custody of the samples from the field to the designated analytical laboratory. The same chain-of-custody procedures will be used for the transfer of samples from one laboratory to another, if required.

The field sampling personnel will complete a *Chain-of-Custody Record and Request for Analysis* form (CC/RA form, Figure SOP-2-1) for each separate container of samples to be shipped or delivered to the laboratory for chemical or physical (geotechnical) analysis. Information contained on the triplicate, carbonless form will include:

1. Project identification;
2. Date and time of sampling;
3. Sample identification;
4. Sample matrix type;
5. Sample preservation method(s);
6. Number and types of sample containers;
7. Sample hazards (if any);
8. Requested analysis(es);
9. Requested sample turnaround time;
10. Method of shipment;
11. Carrier/waybill number (if any);

12. Signature of sampling personnel;
13. Name of MFG Project Manager;
14. Signature, name and company of the person relinquishing and the person receiving the samples when custody is being transferred;
15. Date and time of sample custody transfer; and
16. Condition of samples upon receipt by laboratory.

The sample collector will cross out any blank space on the CC/RA form below the last sample number listed on the part of the form where samples are listed. The samples will be carefully packaged into shipping containers/ice chests.

The sampling personnel whose signature appears on the CC/RA form is responsible for the custody of a sample from time of sample collection until the custody of the sample is transferred to a designated laboratory, a courier, or to another MFG employee for the purpose of transporting a sample to the designated laboratory. A sample is considered to be in their custody when the custodian: (1) has direct possession of it; (2) has plain view of it; or (3) has securely locked it in a restricted access area.

Custody is transferred when both parties to the transfer complete the portion of the CC/RA form under "Relinquished by" and "Received by." Signatures, printed names, company names, and date and time of custody transfer are required. Upon transfer of custody, the MFG sampling personnel who relinquished the samples will retain the third sheet (pink copy) of the CC/RA form. When the samples are shipped by a common carrier, a Bill of Lading supplied by the carrier will be used to document the sample custody, and its identification number will be entered on the CC/RA form. Receipts of Bills of Lading will be retained as part of the permanent documentation in the MFG project file.

### 2.3 Sample Custody Within Laboratory

The designated laboratory will assume sample custody upon receipt of the samples and CC/RA form. Sample custody within the analytical laboratory will be the responsibility of designated laboratory personnel. The laboratory will document the transfer of sample custody and receipt by the laboratory by signing the correct portion of the CC/RA form. Upon receipt, the laboratory sample custodian will note the condition of the samples, by checking the following items:

1. Agreement of the number, identification and description of samples received by comparison with the information on the CC/RA form; and
2. Condition of samples (no air bubbles in VOA containers; any bottle breakage; leakage, cooler temperature, etc.).

If any problems are discovered, the laboratory sample custodian will note this information on the "Laboratory Comments/Condition of Samples" section of the CC/RA form, and will notify the MFG sampling personnel or Project Manager immediately. The MFG Project Manager will decide on the final disposition of the problem samples.

The laboratory will retain the second sheet (yellow copy) of the CC/RA form and return the first sheet (white original) to MFG with the final laboratory report of analytical results. The original of the CC/RA form will be retained as part of the permanent documentation in the MFG project file.

A record of the history of the sample within the laboratory containing sample status and storage location information will be maintained in a logbook, or a computer sample tracking system, at the laboratory. The following information will be recorded for every sample access event:

1. Sample identification;
2. Place of storage;
3. Date(s) and time(s) of sample removal and return to storage;
4. Accessor's name and title;
5. Reason for access; and

6. Comments/observations (if any).

The laboratory will provide MFG with a copy of the logbook or computer file information pertaining to a sample upon request.

**2.4 Sample Custody During Inter-Laboratory Transfer**

*If samples must be transferred from one laboratory to another, the same sample custody procedures discussed above will be followed. The designated laboratory person (sample custodian) will complete a CC/RA Record (MFG form or similar) and sign as the originator. The laboratory relinquishing the sample custody will retain a copy of the completed form. The laboratory receiving sample custody will sign the form, indicating transfer of custody, retain a copy, and return the original record to MFG with the final laboratory report of analytical results. The CC/RA Record will be retained as part of the permanent documentation in the MFG project file.*

**2.5 Packaging and Shipping Procedure**

Be sure that all sample containers are properly labeled and all samples have been logged on the Chain-of-Custody Request for Analysis form (CC/RA, SOP-2-1) in accordance with the procedures explained above and in the MFG SOPs entitled WATER QUALITY SAMPLING and SOIL/SEDIMENT SAMPLING FOR CHEMICAL ANALYSIS.

All samples should be packed in the cooler so as to minimize the possibility of breakage, cross contamination and leakage. Before placing the sample containers into the cooler, be sure to *check all sample bottle caps and tighten if necessary. Bottles made of breakable material (e.g., glass) should also be wrapped in protective material (e.g., bubble wrap, plastic gridding, or foam) prior to placement in the cooler. Place each bottle or soil liner into two zip-lock bags to protect from cross-contamination and to keep the sample labels dry. Place the sample containers upright in the cooler. Avoid stacking glass sample bottles directly on top of each other.*

If required by the method, samples should be preserved to 4°C prior to the analysis. Water ice or “blue ice” will be used to keep the sample temperatures at 4°C. The ice will be placed in two zip-lock bags if the samples are to be transported by someone other than the MFG sampler (e.g., a courier or overnight delivery service). Place the zip-lock bags of ice in between and on top of the sample containers so as to maximize the contact between the containers and the bagged ice. If the MFG sampler is transporting the samples to the laboratory shortly after sample collection, the water ice may be poured over and between the sample bottles in the cooler.

If there is any remaining space at the top of the cooler, packing material (e.g., styrofoam pellets or bubble wrap) should be placed to fill the balance of the cooler. After filling the cooler, close the top and shake the cooler to verify that the contents are secure. Add additional packaging material if necessary.

When transport to the laboratory by the MFG sampler is not feasible, sample shipment should occur via courier or overnight express shipping service that guarantees shipment tracking and next morning delivery (e.g., Federal Express Priority Overnight). In this case, place the chain-of-custody records in a zip-lock bag and place the bag on top of the contents within the cooler. Tape the cooler shut with packaging tape. Packaging tape should completely encircle the cooler, and a chain-of-custody seal should be signed and placed across the packaging tape, and across at least one of the opening points of the container.

Retain copies of all shipment records provided by the courier or overnight delivery service and maintain in the project’s file.

## **2.6 Documentation and Records Management**

Daily Field Records or a field notebook with field notes will be kept describing the packaging procedures and the method of shipments. Copies of all shipping records and chain-of-custody records will be retained in the project files.

### 3.0 QUALITY ASSURANCE

The Project Manager or designated QA reviewer will check and verify that documentation has been completed and filed per this procedure.



MFG, Inc.

**STANDARD OPERATING PROCEDURE No. 16**

**EQUIPMENT DECONTAMINATION**

**1.0 SCOPE AND APPLICABILITY**

This Standard Operating Procedure (SOP) describes the methods to be used for the decontamination of all reusable field equipment which could become contaminated during use or during sampling. The equipment may include split spoons, bailers, trowels, shovels, hand augers or any other type of equipment used during field activities.

Decontamination is performed as a quality assurance measure and a safety precaution. It prevents cross contamination between samples and also helps to maintain a clean working environment.

Decontamination is achieved mainly by rinsing with liquids which may include: soap and/or detergent solutions, tap water, distilled weak acid solution, and/or methanol or other solvent. Equipment may be allowed to air dry after being cleaned or may be wiped dry with chemical-free towels or paper towels if immediate re-use is necessary.

At most project sites, decontamination of equipment that is re-used between sampling locations will be accomplished between each sample collection point. Waste produced by decontamination procedures, including waste liquids, solids, rags, gloves, etc., should be collected and disposed of properly, based upon the nature of contamination. Specific details for the handling of decontamination wastes are addressed in the MFG SOP entitled STORAGE AND DISPOSAL OF SOIL, DRILLING FLUIDS AND WATER GENERATED DURING FIELD WORK or may be specified by a project plan.

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## 2.0 PROCEDURES

### 2.1 Responsibilities

It is the responsibility of the field sampling coordinator to ensure that proper decontamination procedures are followed and that all waste materials produced by decontamination are properly managed. It is the responsibility of the project safety officer to draft and enforce safety measures which provide the best protection for all persons involved directly with sampling and/or decontamination.

It is the responsibility of any subcontractors (i.e., drilling contractors) to follow the proper, designated decontamination procedures that are stated in their contracts and outlined in the Site-Specific Health and Safety Plan. It is the responsibility of all personnel involved with sample collection or decontamination to maintain a clean working environment and ensure that any contaminants are not negligently introduced to the environment.

### 2.2 Supporting Materials

1. Cleaning liquids: soap and/or detergent solutions (Alconox, etc.), tap water, distilled water, methanol, weak nitric acid solution, etc.
2. Personal protective safety gear as defined in the Site-Specific Health and Safety Plan.
3. Chemical-free towels or paper towels.
4. Disposable, nitrile gloves.
5. Waste storage containers: drums, boxes, plastic bags, etc.
6. Cleaning containers: plastic and/or stainless steel pans and buckets.
7. Cleaning brushes.
8. Aluminum foil.

### 2.3 Methods

The extent of known contamination will determine the degree of decontamination required. If the extent of contamination cannot be readily determined, cleaning should be done according to the assumption that the equipment is highly contaminated. Decontamination procedures should account for the types of contaminants known or suspected to be present. In general, high levels of organic contaminants should include an organic solvent wash step, and high levels of metals contamination should include a weak acid rinse step.

The procedures listed below constitute the full field decontamination procedure. If different or more elaborate procedures are required for a specific project, they may be specified in sampling and analysis or work plan. Such variations in decontamination protocols may include all, part or an expanded scope of the decontamination procedure stated herein.

1. Remove gross contamination from the equipment by dry brushing, and rinse with tap water.
2. Wash with soap or laboratory-grade detergent solution.
3. Rinse with tap water.
4. Rinse with methanol (optional, for equipment potentially contaminated by organic compounds).
5. Rinse with acid solution (optional, for equipment potentially contaminated by metals).
6. Rinse with distilled or deionized water.
7. Repeat entire procedure or any parts of the procedure as necessary.
8. Air dry.

Decontaminated equipment should be stored in sealable containers, such as Ziplock-type plastic bags or cases or boxes with lids.

## 2.4 DOCUMENTATION

Field notes will be kept describing the decontamination procedures followed. The field notes will be recorded according to procedures described in the MFG SOP entitled FIELD DOCUMENTATION.

## 3.0 QUALITY CONTROL

To assess the adequacy of decontamination procedures, field rinsate blanks may be collected. The specific number of rinsate blanks will be defined in a sampling and analysis or work plan or by the MFG project manager. In general, at least one field rinsate blank should be collected per sampling event or per day.

Rinsate blanks with elevated or detected contaminants will be evaluated by the Project Manager, who will relay the results to the site workers. Such results may be indicative of inadequate decontamination procedures that require corrective actions (e.g., retraining).

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**STANDARD OPERATING PROCEDURE No. 20**

**DATA EVALUATION**

**1.0 SCOPE AND APPLICABILITY**

This Standard Operating Procedure (SOP) describes a protocol for the evaluation of results generated through laboratory analysis of environmental samples. Included in this protocol are procedures to evaluate the completeness, accuracy and precision of data. The data evaluation procedure provided herein may be used to evaluate data quality with respect to project-specific quality objectives or goals. The quality control limits specified by project depend on the data uses and resultant data quality objectives. This SOP generally follows validation guidelines established by the EPA, however it is not meant to be used if an alternative validation protocol, such as USEPA National Functional Guidelines for Organic Data Review, is specified as required for a project.

A project's Quality Assurance Project Plan (QAPP) and/or other planning documents (e.g., Work Plan, Sampling and Analysis Plan, etc.) must be reviewed before this SOP is used to evaluate data. The individual performing the data evaluation shall be familiar with the analytical methods and other procedures used for that project. Familiarity with laboratory quality control requirements for the analyses performed and a project's reporting/documentation requirements is also necessary before this procedure may be used.

**2.0 PROCEDURES**

A Data Evaluation Checklist is attached to this SOP. This form, or a similar project-specific form, should be completed to document the data evaluation process and summarize the evaluation results. The procedures for completing the attached Data Evaluation Checklist are as follows:

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1. Review project planning documents (e.g., sampling and analysis plan, quality assurance plan) and note the planned analysis methods, detection limits, quality control samples and quality control limits specified for each sample type.
2. Check to see if copies of the Chain-of-Custody records (COCs) are present. If present, verify that all necessary information was provided on each COC and that all necessary signatures are present. Verify that all samples listed on the COCs were analyzed for the appropriate parameters. Note any problems written on the COCs by either the laboratory or the sampler.
3. Briefly summarize the laboratory's narrative, if present. If notes or comments were written on individual data pages, summarize these also.
4. Review temperature and preservation information to verify that samples were properly preserved.
5. For each sample and each parameter, verify that the analyses were performed within the appropriate holding time. If the specific dates of analysis are not provided, check the date the report was issued. This may be helpful if the report date is within the sample holding times (i.e., most metals have a 6-month hold time, and reports are usually issued prior to 6 months indicating the analyses were performed within hold times).
6. Verify that the field QC samples specified in the Work Plan, SAP or QAPP for the project have been collected at the correct frequency.
7. Review the results of all blanks, including field QC samples (equipment blanks, trip blanks) and laboratory method blanks. If an analyte was detected in a blank, check to see if any sample results associated with that blank were within five times the blank concentration. If an associated sample result is less than five times the blank concentration, the result is potentially biased high and may be considered non-detect. If an analyte is detected in the method blank and another type of blank, first apply this five times rule using the method blank concentration. This may result in the other blank being considered non-detect due to method blank contamination.
8. Check the matrices, units and detection or reporting limits for each result to verify that they are reported correctly and meet any project-specific requirements. Contact the laboratory regarding any discrepancies.
9. If organic analyses were performed, check the surrogate recoveries for each sample to ensure that the recoveries were within the laboratory's control limits. If a surrogate recovery is outside of the control limits, the associated sample data may be biased and should be considered estimated results.
10. Review all LCS (and LCSD if available) recoveries and verify that they were within the project-specified control limits. If project-specific control limits are not

provided, use the method control limits or laboratory's control limits. If an LCS recovery was above the control limits, the associated data are potentially biased high, and if the LCS recovery was below the control limits the associated data are potentially biased low. If an LCS and an LCSD were analyzed, compare the LCS/LCSD RPD to the appropriate control limit. An RPD outside of the control limits indicates poor analytical precision. LCS recoveries and LCS/LCSD RPDs outside of control limits should be discussed with the laboratory so that they can take corrective actions.

11. Review all MS (and MSD if available) recoveries and verify that they were within the project-specified control limits. If project-specific control limits are not provided, use the method control limits or laboratory's control limits. If an MS recovery was above the control limits the associated data are potentially biased high due to matrix effects, and if the MS recovery is below the control limits the associated data are potentially biased low due to matrix effects. MS recoveries consistently outside of control limits should be discussed with the lab to determine if corrective actions are necessary. If an MS and an MSD were analyzed, compare the MS/MSD RPD to the appropriate control limit. An RPD outside of the control limits indicates poor precision for the matrix type (e.g., surface water).
12. If an analytical duplicate was analyzed, calculate the RPD and compare this to the project-specified control limits. If a project-specific control limit is not available, use the method control limits or the laboratory's control limits. However, if one or both of the results are less than five times the detection limit, used  $\pm 2$  times the detection limit as the control limit. If an RPD is outside of the control limits, the associated data should be considered estimated values due to poor analytical precision.
13. If field duplicates were analyzed, calculate the RPD for each parameter and compare the RPDs to project-specified control limits. If project-specific control limits are not available, use 30 percent for aqueous samples and 50 percent for soil samples. However, if one or both of the results are less than five times the detection limit, use  $\pm 2$  times the detection limit as the control limit. If an RPD is outside of the control limits, the associated data should be considered estimated due to poor field and/or analytical precision.
14. Calculate the project completeness (see Section 4.0). Compare this number to the project completeness goal.
15. Comments: Provide a brief summary of the accuracy, precision and completeness of the data set, including a discussion of data usability. Definitions of accuracy, precision and completeness are provided in Section 4.0. Discuss any QC that is outside of the specified control limits and identify any samples that have been affected.

## 2.1 Documentation

A Data Evaluation Checklist (attached), or similar form, should be completed to document the evaluation process and evaluation results. These checklists should be provided to the MFG Project Manager and included in the project's laboratory results file.

## 3.0 QUALITY ASSURANCE/QUALITY CONTROL

Definitions of accuracy, precision and completeness and methods for computing their measures are provided below. Calculations should be checked by an independent reviewer.

### 3.1 Accuracy

Accuracy is the degree of difference between the measured or calculated value and the true value. Data accuracy or analytical bias is often evaluated by the analysis of surrogate standards for organic analyses, and laboratory control samples (LCS) and matrix spike (MS) samples for organic and inorganic samples, with results expressed as a percentage recovery measured relative to the true (known) concentration. The percentage recovery for surrogate standards and LCS samples is given by:

$$\text{Recovery (\%)} = \frac{A}{T} \times 100$$

where: A = measured concentration of the surrogate or LCS; and  
T = known concentration.

The percentage recovery for MS samples is given by:

$$\text{Recovery (\%)} = \frac{A - B}{T} \times 100$$

where: A = measured concentration of the spiked sample;  
B = concentration of unspiked sample; and  
T = amount of spike added.

Blanks (i.e., equipment, field, trip, method) are often analyzed to quantify artifacts introduced during sampling, transport, or analysis that may affect the accuracy of the data. In addition, the initial and continuing calibration results may be reviewed to verify that the sample concentrations are accurately measured by the analytical instrument.

### 3.2 Precision

Precision is the level of agreement among repeated measurements of the same characteristic. Data precision or analytical error is assessed by determining the agreement among replicate measurements of the same sample and measurements of duplicate samples, which include MS/MSD samples, laboratory duplicate samples and field duplicate samples. The comparison is made by calculating the relative percent difference (RPD) as given by:

$$\text{RPD (\%)} = \frac{2(S_1 - S_2)}{S_1 + S_2} \times 100$$

where:  $S_1$  = measured sample concentration; and  
 $S_2$  = measured duplicate concentration.

### 3.3 Completeness

Completeness is the percentage of valid measurements or data points obtained, as a proportion of the number of measurements or data points planned for the project. Completeness is affected by such factors as sample bottle breakage and acceptance/non-acceptance of analytical results. Percentage completeness (C) is given by:

$$C (\%) = \frac{V}{P} \times 100$$

where: V = number of valid measurements/data points obtained; and  
P = number of measurements/data points planned.

**MFG, INC.**  
**DATA EVALUATION CHECKLIST**

Project No. : \_\_\_\_\_

Lab Project Numbers: \_\_\_\_\_

Sample Numbers or Lab Package Number:

Analytical Methods:

	<u>YES</u>	<u>NO</u>
1. Is a Work Plan, SAP, or QAPP available?	—	
2. Chain of Custody Records:		
Are the COCs present?	—	
Are the COCs complete and signed off?	—	
Were all samples on the COCs analyzed?	—	
Were any problems noted?	—	
3. Was a project narrative available from the laboratory?	—	
Were any problems noted?	—	
4. Were all holding times met?	—	
5. Was the frequency stated in the Work Plan, SAP or QAPP for field QC samples (duplicates, equipment rinsate, trip blanks) met?	—	

YES

NO

6. Were all equipment rinsate blank, trip blank, and method blank results ND?

\_\_\_

7. Were all matrixes, units, and detection limits reported correctly?

\_\_\_

8. Were all surrogate recoveries within control limits?

\_\_\_

9. Were all LCS/LCSD spike recoveries and RPDs within control limits?

\_\_\_

10. Were all MS/MSD spike recoveries and RPDs within control limits?

\_\_\_

11. Were all analytical duplicate RPDs within control limits?

\_\_\_

12. Were all field duplicate RPDs within control limits?

\_\_\_

13. Was the project completeness goal met?

\_\_\_

Comments:

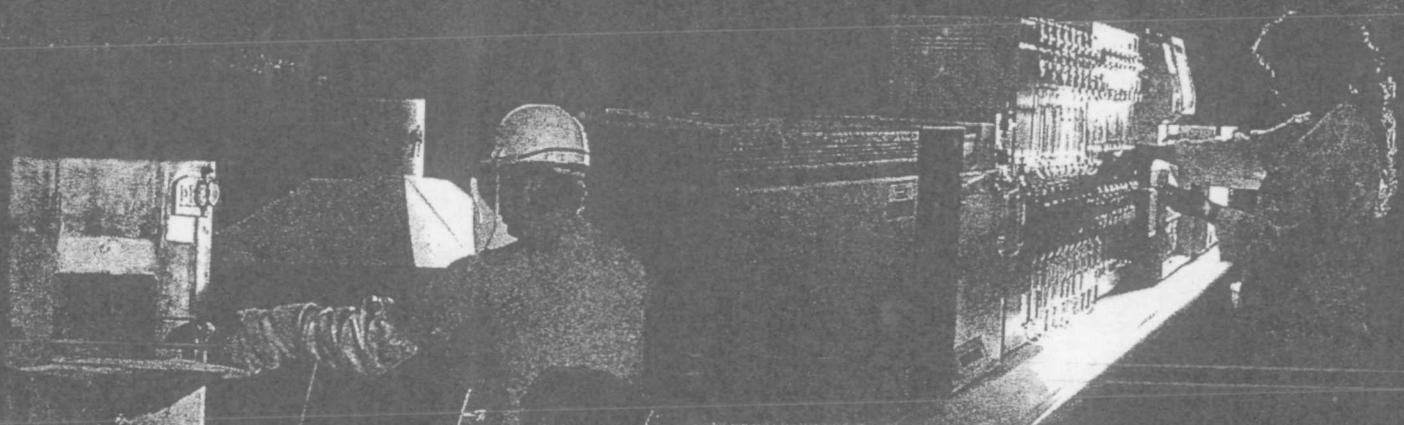
Signed: \_\_\_\_\_

Date: \_\_\_\_\_

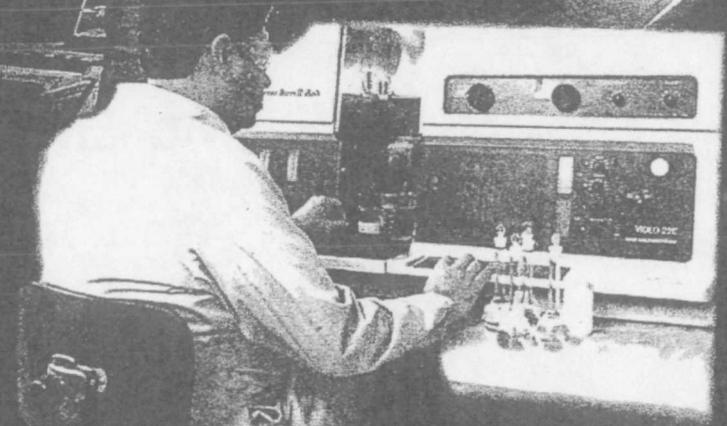
## APPENDIX D

**APPENDIX D**

**SVL Analytical Inc. Quality Assurance Plan**



Fire Assay



Inorganic

Organic

**SVL** ANALYTICAL

SVL ANALYTICAL, INC.

# Quality Assurance Plan

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© SVL Analytical, Inc.  
One Government Gulch • P.O. Box 929  
Kellogg, ID 83837  
Phone (800) 597-7144 Facsimile (208) 783-0891  
<http://www.svl.net>

  
\_\_\_\_\_  
Laboratory Director's Signature

  
\_\_\_\_\_  
Date

---

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## 1. INTRODUCTION

*Quality assurance and quality control measures are integral parts of the established quality system at SVL Analytical, Inc.*

This manual describes the quality assurance program (QAP) at SVL Analytical, Inc. (SVL). This program has the unqualified support of SVL management as well as the agreement, acceptance and adherence of the laboratory staff.

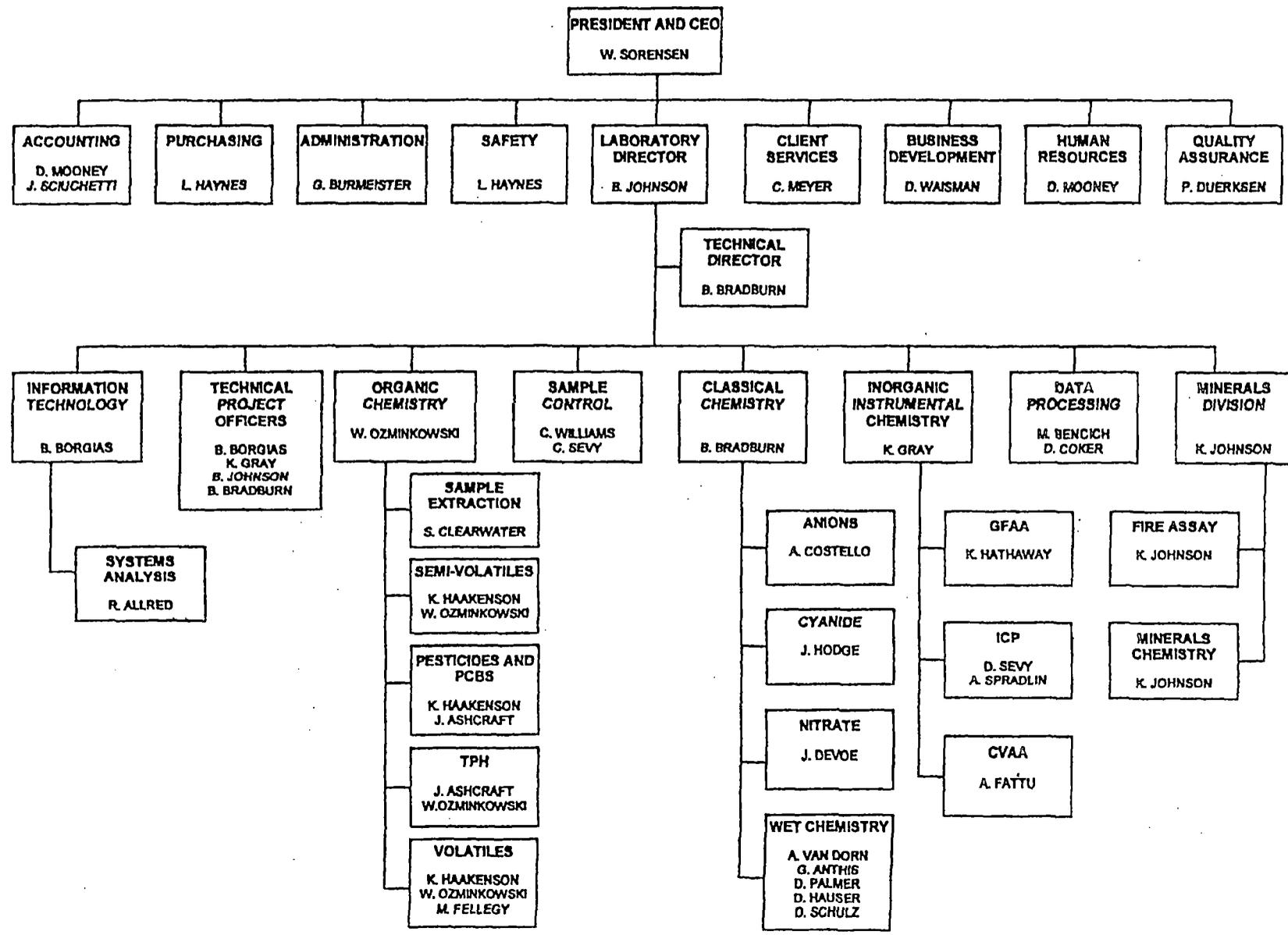
SVL is an analytical laboratory specializing in the performance of tests and parameters used in the characterization of environmental and mining samples. Since 1972, SVL has analyzed water, soil, sediment, sludge, oil, paint, rock, fish and other animal tissues, vegetation, air filters, and other sample types.

SVL occupies modern facilities specifically designed and organized to ensure an efficient mode of operation. The 25,000 square foot laboratory building has been modified to the specific needs of our large capacity analytical laboratory. Building access, security and safety features have been carefully considered. Access through the outside laboratory entrance and to internal areas is limited to laboratory and other essential personnel. Each laboratory division is plumbed and wired separately with easily accessible shut-off stations.

### 1.1 Organizational Chart

The organizational structure of SVL follows a traditional scheme of management with a few modifications. The President and CEO is at the top of the chain of command followed by the Laboratory Director. The Safety, Quality Assurance, Client Services, and Business Development divisions report directly to the CEO; all other lab employees report to the Laboratory Director. A complete organizational chart for SVL Analytical, Inc. is contained on the following page.

# ORGANIZATIONAL CHART



**1.2 Personnel**

<b>Position</b>	<b>Employee</b>	<b>Degree</b>	<b>Lab Experience</b>
President	Wayne Sorensen	BS 1962	36
Laboratory Director	J. Blake Johnson	Ph.D. 1971	18
Technical Director	Bruce Bradburn	MS 1990	11
Supervisor Inorganic Instrumental Chemistry	Kirby Gray	BS 1972	18
Supervisor Organic Chemistry	Wendy Ozminkowski	BS 1997	4
Inorganic Instrument Operator (IC)	Ann Costello	BS 1971	16
ICP Spectroscopist	Anne L. Spradlin	BA 1983	17
Inorganic Instrument Operator (ICP)	Danny Sevy		15
Inorganic Instrument Operator (GFAA)	Kevin Hathaway		15
Inorganic Instrument Operator (CVAA)	Arlene Fattu	BS 1975	13
Classical Chemistry Department Analyst	James L. Hodge		30
Classical Chemistry Department Analyst	Alice Van Dorn		11
Classical Chemistry Department Analyst	Janice DeVoe	BS 1977	20
Classical Chemistry Department Analyst	Dean Palmer	BS 1979	5
Classical Chemistry Department Analyst	Gordon Anthis		13
Classical Chemistry Department Analyst	Debbie Schulz		1
Classical Chemistry Department Analyst	Kay Johnson		13
Classical Chemistry Department Chemist	David Hauser	BS 1996	1
Organic Chemistry Department Chemist	Kristine Haakenson	BS 1991	10
Organic Chemistry Department Chemist	Stephanie Clearwater	BS 2000	1
Organic Chemistry Department Analyst	Mark Fellegy		13
Organic Chemistry Department Analyst	Judy Ashcraft		33
Quality Assurance Coordinator	Paul Duerksen	BS 1977	21
Safety Director	Lee Haynes		12
Document Control Manager	Melba Bencich		14
Sample Control Manager	Carol Williams		14
Client Services Manager	G. Christine Meyer		
Business Development Manager	Dave Waisman	MS 1985	
Information Technology Manager	Brandan Borgias	Ph.D. 1985	22
Systems Analyst	Russell Allred		19
Accounts Receivable	Donella Mooney		
Accounts Payable	Joyce Sciuchetti		
Sample Receiving	Crystal Sevy		1
Document Processing and Reporting	Dee Coker		

## 1.3 Resumes

### WAYNE R. SORENSEN

#### PROFESSIONAL EXPERIENCE:

- 1973 -  
PRESENT **SVL Analytical, Inc. - Kellogg, ID**  
President: Owner and founder of the laboratory. Administers company policies and formulates business strategies.
- OCT 1969 -  
APR 1973 **The Bunker Hill Company - Kellogg, ID**  
Supervised a large integrated mine, mill and smelter analytical laboratory and trained personnel.
- MAR 1968 -  
OCT 1969 **Kennecott Copper, Ray Mines Division**  
Chief Chemist: Supervised an assay lab, trained assayers for new analytical methods and conducted applied research.
- MAY 1965 -  
MAR 1968 **Kennecott Copper, Western Mining Division Research Center**  
Analytical Chemist: Analytical methods development and applied metallurgical research on copper.

#### EDUCATION:

- 1958 - 1962 **Utah State University - Logan, UT**  
B.S. Chemistry (minor: mathematics, physics)
- 1965 **Salt Lake Trade Tech - Salt Lake City, UT**  
Basic Industrial Statistics
- 1966 - 1967 **University of Utah - Salt Lake City, UT**  
MBA program
- 1968 **Arizona State University - Tempe, AZ**  
Modern Industrial Spectroscopy
- 1969 **Arizona State University - Tempe, AZ**  
Creative Management

SVL ANALYTICAL, INC.

**WAYNE R. SORENSON (continued)**

**PUBLICATIONS:**

"A Study of Variables Affecting the Quality of Electrowon Copper" paper presented at the 1968 meeting of the Electrolytic Process Committee and the 1969 National AIME Conference.

**PATENTS:**

Electrolyte circulation system for an electrolytic cell.

SVL ANALYTICAL, INC.

**J. BLAKE JOHNSON**

**PROFESSIONAL EXPERIENCE:**

JAN 1990 - **SVL Analytical, Inc. Kellogg, ID**  
PRESENT

Laboratory Director – Manages and directs the activities of the laboratory.

AUG 1989 - **Consultant - Spokane, WA**  
JAN 1990

JUL 1979 - **Baroid Corporation - Houston, TX**  
AUG 1989

Director of Exploration and Property Management – Managed and directed all geological investigations, worldwide, and managed all domestic production properties.

DEC 1978 - **Baroid Corporation - Houston, TX**  
JUL 1979

Assistant Director of Exploration.

MAR 1973 - **NL Industries - Golden, CO**  
DEC 1978

Chief Geochemist – Planned and implemented all geochemical investigations, worldwide.

FEB 1972 - **Geosensors - Spokane, WA**  
MAR 1973

Geochemist – Investigated the relationships between airborne radiometric data and uranium deposits and petroleum reservoirs.

JUN 1969 - **Vanguard Exploration - Spokane, WA**  
FEB 1972

Geochemist – Performed laboratory and field investigations as applied to mineral exploration.

**EDUCATION:**

1967 - **University of Idaho - Moscow, ID**  
1969

Ph.D. Geology (minor in Chemistry)

1963 - **Whitworth College - Spokane, WA**  
1967

B.S. Geology (minor in Chemistry)

SVL ANALYTICAL, INC.

**J. BLAKE JOHNSON (continued)**

**PUBLICATIONS:**

"Geochemistry of Belt Supergroup Rocks, Coeur d'Alene District, Shoshone County, Idaho"; unpublished Ph.D. dissertation, University of Idaho, April 1971.

"Studies on the Molecular Weight of Petroleum Asphaltenes Via the Vapor Pressure Osmometer"; paper presented at the Northwest Regional Meeting of the American Chemical Society, at Richland, Washington, June 1967.

SVL ANALYTICAL, INC.

**G. CHRISTINE MEYER**

**PROFESSIONAL EXPERIENCE:**

1993 -  
PRESENT

**SVL Analytical - Kellogg, ID**

Client Services Manager – Secures commercial contracts; confers with technical staff and assigns project management for contracts. Primary in-house service representative, responsible for developing and distributing company literature to existing and potential clients.

JUN 1978 -  
1993

**SVL Analytical - Kellogg, ID**

Project Manager, Minerals Division – Secured contracts with clients; supervised data generation and reporting to ensure quality control, expedited deliverables, and maintained customer service. Monitored all phases of Minerals Division projects.

1977 -  
1978

**Gary's Drug Center - Kellogg, ID**

Pharmaceutical Aide – Assisted in dispensing prescriptions.

1975 -  
1977

**Shoshone School District #391 - Kellogg, ID**

Substitute Teacher – Classroom instruction.

1975

**Idaho State Department of Lands - Kingston, ID**

Office Manager – Responsible for fire dispatch, clerical duties, payroll, and customer service.

**EDUCATION:**

1973 - 1974

**North Idaho College - Coeur d'Alene, Idaho**

Social services studies

1989

**Customer service training seminar**

1990

**MS-DOS Computer class**

**PRESENTATIONS:**

"Everything You Always Wanted to Know About Fire Assaying, But Were Afraid to Ask", Geological Society Meeting, 1992.

SVL ANALYTICAL, INC.

**BRANDAN A. BORGAS**

**PROFESSIONAL EXPERIENCE:**

1991 -  
PRESENT **SVL Analytical, Inc. - Kellogg, ID**

Systems Manager, Computational Chemist – Responsibilities include developing and implementing SVL's Laboratory Information Management System (LIMS).

JUN 1989 -  
MAR 1990 **Cray Research - San Ramon, CA**

Software Technical Support Analyst – Co-administrator of network composed of eight file servers and over 50 client work stations distributed throughout the western U.S. Unix (Sun OS and Cray UNICOS) operating systems experience.

1985 -  
1989 **University of California, UCSF - San Francisco, CA**

Postdoctoral Scholar – Developed computer programs (FORTRAN) for the refinement and analysis of macromolecular structure. VAX, Sun, and Cray computers and VMS and UNIX operating systems.

1979 -  
1985 **University of California, Berkeley - Berkeley, CA**

Graduate Research and Teaching Assistant – Dissertation on coordination isomers of highly efficient chelating agents for Fe. Teaching Assistant for X-ray Crystallography, and General, Analytical, and Biophysical Chemistry.

**EDUCATION:**

1979 -  
1985 **University of California, Berkeley - Berkeley, CA**

Ph.D. Chemistry, 12/85 - Elected to Sigma Xi.

1975 -  
1979 **Reed College - Portland, OR**

BA Chemistry/Physics, 5/79 - Elected to Phi Beta Kappa, 1979.

**COMPUTER/PROFESSIONAL TRAINING**

AUG 1996 **Competitive Edge Environmental Management Systems**

Introduction to ISO14000

APR 1995 **North Idaho College**

Intermediate Access

**BRANDAN A. BORGIAS (continued)**

FEB 1993 **Clarion Software**

Upgrading to Clarion Professional Developer 3.0.

MAR 1992 **ACS Short Course**

Laboratory Information Management Systems: From Problem Definition to System Evaluation.

AUG 1989 -  
DEC 1989 **Cray Research**

Cray Y-MP Series System Architecture for Systems Analysts. Designing For Speed. Advanced Fortran Features and Optimization.

SUMMER  
1988

**National Center for Supercomputing Applications (NCSA)**

NSF Summer Institute in Supercomputing.

SPRING 1988 **Pittsburgh Supercomputing Center**

NIH Biomedical Super-computing Workshop.

FALL 1979 **Reed College**

Fortran Programming.

**PUBLICATIONS:**

The Characterization & Structure of  $[H_7O_3]^+[As(catecholate)_3]$  p-dioxane, B.A. Borgias, G.G. Hardin and K.N. Raymond, Inorg. Chem., (1986) **24**, 1057-1060.

Structural Chemistry of Gallium(III). Crystal Structures of  $K_3[Ga(catecholate)_3] \cdot 1.5H_2O$  and  $[Ga(benzohydroxamate)_3] \cdot H_2O \cdot CH_3CH_2OH$ , B.A. Borgias, S.J. Barclay and K.N. Raymond, J. Coord. Chem. (1986) **15**, 109-123.

Isomerization and Solution Structures of Desferrioxamine B Complexes of Al and Ga, B.A. Borgias, A.D. Hugi and K.N. Raymond, Inorg. Chem., (1989), **28**, 3538-3545.

COMATOSE: A Method For Constrained Refinement of Macromolecular Structure Based on Two-Dimensional Nuclear Overhauser Effect Spectra, B.A. Borgias and T.L. James, J. Magn. Reson. (1988) **79**, 493-512.

2D NOE Complete Relaxation Matrix Analysis, B.A. Borgias and T.L. James, in NMR in Enzymology, **176** in Methods in Enzymology (N.J. Oppenheimer and T.L. James, eds.) Academic Press, Orlando, 169-183 (1989).

MARDIGRAS: Matrix Analysis of Relaxation for Discerning Geometry of an Aqueous Structure, B.A. Borgias and T.L. James, J. Magn. Reson. (1990) **87**, 475-487.

SVL ANALYTICAL, INC.

**DAVE WAISMAN**

**PROFESSIONAL EXPERIENCE:**

APR 1993 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Business Development Manager

MAR 1988 - **Hecla Mining Company - Republic, WA**  
APR 1993

Senior Exploration Geologist – Managed Exploration Office. Responsible for project cost tracking, drilling performance tracking, supervision of abandonment and reclamation of drill sites, design, budget and management of exploration efforts.

APR 1987 - **Golder Associates, Inc. - Seattle, WA**  
NOV 1987

Geologist, Geotechnical Engineer – Well-site geologist for water monitoring wells at Hanford Nuclear Reservation. Well construction and QA review for Test and Operating Procedures for Basalt Waste Isolation Project.

MAY 1985 - **Consulting Geologist - Missoula, MT**  
JAN 1987

Geological consulting in SW Montana for two major mining companies. Responsibilities included property evaluations, mapping and sampling. Experienced in reverse circulation and diamond drilling, and trace element geochemistry.

JUN 1984 - **Meridian Minerals Co. - Billings, MT**  
JAN 1985

Geologist – Conducted precious metals reconnaissance in Belt and volcanic rocks of SW Montana, property submittal evaluations, trace element geochemistry.

**EDUCATION:**

1982 - **University of Montana, Missoula MT**  
1985

MS Geology 1985

1975 - **Colorado State University, Fort Collins**  
1979

BS Geology 1979

**PUBLICATIONS:**

Waisman, D.J., 1990, "Hecla's Golden Eagle Deposit, Republic Mining District", presented at the 96th Annual Northwest Mining Association Convention, 1990.

Waisman, D.J., 1992, "Minerals of the Black Pine Mine, Granite County, Montana", The Mineralogical Record, December 1992 (Vol. 23, No. 6, pp. 477-483).

SVL ANALYTICAL, INC.

**M. LEE HAYNES**

**PROFESSIONAL EXPERIENCE:**

- NOV 1989 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT
- Safety Director – Responsible for corporate health and safety policy, implementation of Chemical Hygiene Plan, waste disposal, and recycling.
- 1992 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT
- Purchasing Officer – Responsible for purchasing, receiving, and verifying orders with vendors.
- JAN 1991 - **Private Instructor**  
PRESENT
- Hazardous Materials, Hazardous Waste, and Emergency Response – Edwards & Associates
- SEP 1978 - **Shoshone County Assessor's Office - Wallace, ID**  
OCT 1989
- Senior Appraiser, Director of Disaster Services

**EDUCATION:**

- MAR 1997, **OSHA**  
1998-99
- 40 Hour Hazardous Waste Operation & Emergency Response Course and Refreshers
- 1996 **UPS**
- HM126F - Shipping Hazardous Materials
- 1996 AND **J.T. Baker**  
1995
- Laboratory Safety/Hazardous Chemicals Safety/Spill Response/Hazardous Chemicals
- 1989 **Emergency Management Institute**
- Basic Course 3 and 4/Hazmat-Advanced course/PDS Capstone on National Security
- 1988 **Shoshone County Hospital**
- Emergency Medical Technician
- 1988 **Emergency Management Institute**
- Management Principles/Exercise Design

SVL ANALYTICAL, INC.

**M. LEE HAYNES, cont.**

1977      **Dale Carnegie Course**

Graduated 1977

1970      **Burroughs Computer School - Chicago, IL**

Diploma

1967      **Officers Candidate School - U.S. Army**

Commissioned - 2nd Lieutenant

**SVL ANALYTICAL, INC.**

**KIRBY L. GRAY**

**PROFESSIONAL EXPERIENCE:**

MAR 1987 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Inorganic Instrumental Chemistry Department Supervisor – Responsible for sample analysis by ICP, GFAA, FLAA, IC and CVAA.

SEP 1986 - **Radersburg Mining Co. - Toston, MT**  
MAR 1987

Chemist: – Responsible for fire assay, FLAA, and sample preparation.

MAY 1984 - **Sunshine Mining Co. - Kellogg, ID**  
MAY 1986

Chemist – Responsible for fire assay, FLAA, and classical chemistry.

AUG 1983 - **IDHW, State of Idaho - Kellogg, ID**  
AUG 1983

Environmental Technician: –Operated X-ray fluorescence meter and collected soil samples.

MAY 1972 - **The Bunker Hill Co. - Kellogg, ID**  
MAY 1982

Material Recovery Supervisor – Responsible for operation and maintenance of water treatment plant, sulfuric acid plant, baghouse, cadmium refinery, and electric reveratory furnace at a lead smelter.

**EDUCATION:**

SEP 1968 - **University of Idaho - Moscow, ID**  
MAY 1972

B.S. Geological Engineering

SEP 1966 - **North Idaho College-Coeur d'Alene, ID**  
JUN 1968

Engineering major

SVL ANALYTICAL, INC.

**BRUCE BRADBURN**

**PROFESSIONAL EXPERIENCE**

APR 2001 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Technical Director and Classical Chemistry Department Supervisor – Supervises inorganic analyst staff; responsible for ion chromatography, alkalinity, residues, turbidity, COD, fluoride, nitrate, nitrite, TKN, ammonia, cyanide, sulfur, sulfide, TCLP, SPLP, pH, flashpoint.

OCT 1997 - **Spokane Tribe of Indians – Spokane, WA**  
APR 2001

Laboratory Manager – Supervised and trained staff; developed analytical methods; acquired EPA and WDOE certifications; wrote quality assurance plan; maintained laboratory instruments; reviewed data; analyzed samples by ICP-AES, CVAA, FAA, GFAA.

JUL 1995 - **SVL Analytical, Inc. – Kellogg, ID**  
NOV 1997

Inorganic Chemist – Analyzed samples by ICP; GFAA, and FAA; developed computer programs for laboratory instrumentation

APR 1994 - **American Analytical Laboratories, Inc. – Seattle, WA**  
JUL 1995

Laboratory Manager – Supervised staff chemists; developed analytical methods; maintained laboratory instrumentation; analyzed samples for pesticides and PCBs; conducted ICP-AES, GC, FAA, and IC analyses.

MAR 1991 - **Northwest Laboratories of Seattle – Seattle, WA**  
NOV 1993

Chemist – Analyzed and certified raw materials; conducted ICP, GC, and FTIR analyses.

**EDUCATION:**

JULY 1996 **Jobin-Yvon Emission**

ICP Applications

1987 - 1990 **University of New Mexico – Albuquerque, NM**

M.S. Chemistry

1982 - 1987 **Western Washington University – Bellingham, WA**

B.S. Chemistry

SVL ANALYTICAL, INC.

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SVL ANALYTICAL, INC.

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SVL ANALYTICAL, INC.

**PAUL E. DUERKSEN**

**PROFESSIONAL EXPERIENCE:**

- DEC 1999 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT
- Quality Assurance Coordinator – Coordinates quality assurance and training programs for the laboratory, maintains laboratory accreditations, writes standard operating procedures, calibrates equipment, reviews data, conducts audits, performs root cause analysis.
- MAY 1998 - **Private Consultant – Silverdale, WA**  
DEC 1999
- Provided instruction in math and science courses
- 1995 - **Environmental Science Department, Washington State**  
MAY 1998  
**University – Richland, WA**
- Graduate coursework in Environmental Science
- OCT 1995 - **Northwest Technical Resources – Richland, WA**  
FEB 1996
- Quality Assurance Coordinator – Conducted audits of environmental laboratory; prepared analytical data packages; maintained training records.
- MAR 1990 - **Hanford Environmental Health Foundation – Richland, WA**  
MAY 1995
- Quality Assurance Coordinator – Prepared and reviewed written procedures; conducted audits of industrial hygiene laboratory; conducted technical training courses; created document control and records handling systems; conducted audits of suppliers and sub-contractors
- 1987 - **Brown and Caldwell Analytical Laboratories – Glendale, CA**  
MAR 1990
- Quality Assurance Coordinator – Reviewed written procedures; prepared analytical data packages; coordinated performance evaluation sample program.
- JAN 1983 - **Brown and Caldwell Analytical Laboratories – Glendale, CA**  
1987
- Chemist – Analyzed water, wastewater, soil, and waste samples for trace metals by inductively coupled plasma and graphite furnace atomic absorption spectroscopy; calibrated and maintained analytical instrumentation; directed work activities for two technicians.
- NOV 1980 - **Jacobs Laboratories – Pasadena, CA**  
JAN 1983
- Chemist – Analyzed water, wastewater, soil, and waste samples for trace metals by atomic absorption spectroscopy; analyzed wastewater samples for cyanide, BOD, and COD.

**EDUCATION:**

- 1995 - **Washington State University – Richland, WA**  
1998  
40 credits coursework toward M.S. in Environmental Science
- 1995 **Columbia Basin College – Richland, WA**  
Occupational Instruction
- 1993 **Columbia Basin College – Richland, WA**  
Principles of Industrial Hygiene
- 1992 **U.S. Department of Energy – Richland, WA**  
Introduction to Root Cause Analysis
- 1990 **U.S. Department of Energy– Richland, WA**  
Auditing for Lead Auditors
- 1973 - **University of California - Berkeley**  
1977  
B.S. Chemistry, June 1977

SVL ANALYTICAL, INC.

**CAROL WILLIAMS**

**PROFESSIONAL EXPERIENCE:**

JUL 1987 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Sample Control Manager -- Manages job creation for incoming samples

JUN 1986 - **Shoshone Glass - Kellogg, ID**  
JUL 1987

Monthly billing, procurement of supplies, scheduling

AUG 1982 - **First National Bank of North Idaho - Kellogg, ID**  
MAY 1986

Bank Teller -- Paying and receiving

AUG 1982 - **Silver Valley Laboratories-Osburn, ID**  
MAY 1986

Lab Technician -- Performed Cyanide analyses, and water and soil digestions

**EDUCATION:**

1979 - **North Idaho College - Coeur d'Alene, ID**  
1981

General Studies

SVL ANALYTICAL, INC.

**JAMES L. HODGE**

**PROFESSIONAL EXPERIENCE:**

MAR 2001 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Classical Chemistry Department Analyst – Performs analysis of total and WAD Cyanide.

OCT 1995 - **Sunshine Mining and Refining Co. – Kellogg, ID**  
MAR 2001

Analyzed samples for silver and gold by fire assay; conducted atomic absorption and ICP analysis

SEP 1993 - **Morrison Knudson Corporation**  
OCT 1995

Conducted soil sampling; tested and maintained respirators; operated Bobcat loader

JUL 1991 - **Pintlar Corporation**  
SEP 1993

Environmental and Health & Safety Manager—Responsible for health and safety; wrote health and safety plans; oversaw environmental and reclamation projects

JUN 1983 - **Bunker Limited Partnership**  
JUL 1991

Laboratory Manager— Operated water treatment plant; oversaw environmental reclamation projects

JUN 1967 - **Bunker Hill Mining Co.**  
OCT 1982

Laboratory Technician – Analyzed samples by fire assay; conducted wet chemical and atomic absorption analysis

**EDUCATION:**

APR 1993 **Urie Environmental Health, Inc.**

40-hour Hazardous Materials

JUL 1993 **MCS Environmental**

40-hour Asbestos Contractor Supervisor

APR 1993 **Urie Environmental Health, Inc.**

80-hour Industrial Hygiene

SVL ANALYTICAL, INC.

**DEAN PALMER**

**PROFESSIONAL EXPERIENCE:**

MAR 1996 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Classical Chemistry Department Analyst – Prepares water samples for analysis by ICP and GFAA (extracts and distillates) using SW-846 and EPA 200 series methods.

1983 - **Northern States Power Company - Welch, MN**  
1994

*Prairie Island Nuclear Plant Training Center, Production Engineer – Instruction of employees in the areas of math and physics as well as general employee training. Developed and taught course on site orientation, power plant fundamentals, industrial safety, radiological protection and respirator use.*

1980 - **Kerr-McGee Nuclear - Grants, NM**  
1982

Associate Mechanical Engineer. – Design and modification of mine mechanical equipment such as pumping, hydraulics, noise abatement, hoisting.

**EDUCATION:**

1969 - **North Dakota State University - Fargo, ND**  
1972

B.S. Social Science - Secondary Ed; Minor - Mathematics

1976 - **South Dakota School of Mines and Technology - Rapid City, SD**  
1979

B.S. Mechanical Engineering

SVL ANALYTICAL, INC.

**JANICE B. DeVOE**

**PROFESSIONAL EXPERIENCE:**

MAR 1990 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Classical Chemistry Department Analyst – Conducts Nitrate, Nitrite, and Ammonia analyses by Autoanalyzer, experienced in Chloride, Sulfate, Nitrate, Nitrite, and Fluoride analyses by ion chromatography and in analysis for Alkalinity, COD, and Phenolics

SEP 1980 - **Ferry County Memorial Hospital - Republic, WA**  
MAR 1984

Medical Technician

NOV 1979 - **Good Samaritan Hospital - Phoenix, AZ**  
JUN 1980

Medical Technician

AUG 1978 - **Ferry County Memorial Hospital- Republic, WA**  
AUG 1979

Medical Technician

AUG 1977 - **Harris Laboratories - Lincoln, NE**  
JUL 1978

Laboratory Technician

**EDUCATION:**

JAN 2001 **OI Corporation**

Operation of FS-3000 Auto-analyzer

1973- **Fort Lewis College - Durango, CO**  
1977

B.S. Biology

SVL ANALYTICAL, INC.

**ALICE VAN DORN**

**PROFESSIONAL EXPERIENCE:**

MAY 1990 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Classical Chemistry Department Analyst – Conducts TDS, TSS, TVS, pH, Turbidity, and Conductivity analyses; digests samples for metals analysis; air filter monitoring and digestions.

**EDUCATION:**

1970 **Green River Community College - Auburn, WA**

General Studies

1970 - **Southwestern Oregon Community College - Coos Bay, OR**  
1972

AA Business Science; including Biology course work.

SVL ANALYTICAL, INC.

**GORDON ANTHIS**

**PROFESSIONAL EXPERIENCE:**

JUL 1988 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Classical Chemistry Department Analyst – Conducts TCLP and SPLP extractions, and meteoric water mobility studies; assists in sample receipt and chain-of-custody.

1986 - 1988 **U.S. Forest Service – Bonners Ferry**  
SEASONAL

Fought forest fires; planted trees

1986-1988 **Coeur d'Alene Tree Nursery – Coeur d'Alene, ID**  
SEASONAL

Harvested and sorted trees

SEP 1985 - **Enternal Line – Mullan, ID**  
NOV 1985

Flagger for road crew

SEP 1984 - **Astoria Oil Services–Astoria, OR**  
JUL 1985

Building construction, framing, sheet rock.

**EDUCATION:**

1999 **North Idaho College – Coeur d'Alene, ID**

Course work in Algebra, Computer Programs

1998 **Kellogg North Idaho College – Kellogg, ID**

Windows 95

1997 **Edwards & Associates–Wallace, ID**

Hazardous Materials and Hazardous Waste

1983 - **North Idaho College–Kellogg, ID**  
1984

Diesel Mechanics

SVL ANALYTICAL, INC.

**DAVID HAUSER**

**PROFESSIONAL EXPERIENCE:**

AUG 2001-  
PRESENT      **SVL Analytical, Inc. – Kellogg, ID**

Classical Chemistry Department Chemist – Analyzes samples for Fluoride, Flashpoint, Specific Conductivity, Hardness, Phenols, and Phosphate; operates LECO instrument to analyze samples for ABA and Sulfur Forms

AUG 1997-  
AUG 2000      **North Idaho Fitness – Coeur d'Alene, ID**

Developed training and nutrition programs for customers; assessed customer progress

**EDUCATION:**

1993 -  
1996      **University of Idaho – Moscow, ID**

B.S. Secondary Education

1979 -  
1993      **North Idaho College – Coeur d'Alene, ID**

A.A.S. Secondary Education

SVL ANALYTICAL, INC.

## MARK FELLEGY

### PROFESSIONAL EXPERIENCE:

OCT 2001-  
PRESENT **SVL Analytical, Inc. – Kellogg, ID**

Organic Chemistry Department Analyst – Repairs and calibrates gas chromatographs and analytical instrumentation

AUG 1979-  
MAY 2001 **Cargill, Inc. – Wayzata, MN**

Instrument Specialist VII – Installed, repaired, and maintained analytical instrumentation, including gas chromatographs and mass spectrometers; developed analytical methods for pesticide residues and olfactory and flavor compounds

### EDUCATION:

JUL 1974-  
JUL 1975 **South Hennepin Technical College – Eden Prairie, MN**

Environmental Technology Program

APR 2001 **Agilent Technologies**

HP 5973 GC-MSD Troubleshooting and Maintenance (H2294-A)

MAR 2001 **Transportation Skills Program, Inc.**

Hazardous Materials and Waste

AUG 2000 **Training Masters**

High Performance Liquid Chromatography

MAY 2000 **Minnesota Chromatography Forum**

Mass Spectral Interpretation

MAR 1998 **Enigma Analytical**

Applied Statistics and QC/QC Principles

SVL ANALYTICAL, INC.

## STEPHANIE CLEARWATER

### PROFESSIONAL EXPERIENCE:

JUNE 2001 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Organic Chemistry Department Chemist – Performs sample extractions for 608, 625, 8081A, 8141A, and 8270C analyses

NOV 2000 - **Christian Supply – Spokane, WA**  
JUN 2001

Sales Associate – assisted customers, sold merchandise

JUN 2000 - **USDA Forest Service – Avery, ID**  
SEP 2000

Forestry Technician – located timber sales; sprayed for noxious weeds, maintained vehicles

JUN 1999 - **Christian Supply – Spokane, WA**  
OCT 1999

Sales Associate – assisted customers; maintained book stock; faxed customer orders

MAY 1997 - **EyeMasters – Spokane, WA**  
SEP 1998

Lab Technician – fashioned prescription eyewear; maintained and calibrated equipment

### EDUCATION:

SEP 1998 - **Eastern Washington University – Cheney, WA**  
JUN 2000

B.S. Environmental Biology

**KRISTINE B. HAAKENSEN**

**PROFESSIONAL EXPERIENCE**

JUL 1998 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Organic Chemistry Department Chemist – GC/MS Operator. Responsible for analysis of environmental matrices for organic compounds according to standard EPA procedures using GC and GC/MS systems. Experienced in EPA methods 504.1, 524.2, 601/602, 608, 624, 625, 8015, 8021B, 8260B, 8270C, and the associated sample preparation requirements of the analyses. Duties include instrument set-up and maintenance, methods development, and report generation.

OCT 1997 - **Bayer Corporation - Spokane, WA**  
JUL 1998

Quality Control Chemist – Executed analytical assays of injectable finished products and raw materials according to Standard Operating Procedures (SOP) and Good Manufacturing Practices (GMP) to ensure product specifications are met. Utilized various analytical instrumentation to perform analytical assays: HPLC, GC, and UV/VIS spectrophotometer.

SEP 1992 - **Analytical Sciences Laboratory, University of Idaho - Moscow, ID**  
OCT 1997

Senior Organic Chemist – Supervised and managed the organic analytical laboratory division under all principles of Good Laboratory Practices (GLP) and EPA regulations for the routine determination of pesticides, herbicides, and various volatile and semi-volatile organic compounds in water, soil, environmental, and veterinary samples. Delegated and organized all analytical chemists' daily routine and non-routine analyses in the organic analytical group. Primary responsible person for the operation, maintenance, and troubleshooting of all primary analytical instrumentation in the organic laboratory including: GC's, GC/MS, HPLC, UV/VIS spectrophotometer, purge and trap with cryofocusing, high pressure gel permeation chromatograph. Primary responsible person for the performance of method validation and method detection limit studies for all EPA regulated and non-regulated methods under full GLP compliance. Responsible for performing standard recertification studies to guarantee the integrity of all pesticide, herbicide, and residue standards.

**EDUCATION:**

1987 - **Arizona State University - Tempe, AZ**  
1991

BS Chemistry, Emphasis in Biochemistry

1992 **Northwest Quality Symposium**

Good Laboratory Practices Tutorial

1995 **University of Idaho**

Hazardous Waste Management

SVL ANALYTICAL, INC.

**WENDY OZMINKOWSKI**

**PROFESSIONAL EXPERIENCE:**

JAN 2002 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Supervisor Organic Chemistry Department – Responsible for analyses of soil and water samples for organic contaminants; reviews and approves data; operates GC and GC/MS instruments; interprets and reports data.

DEC 1998 - **SVL Analytical, Inc. - Kellogg, ID**  
JAN 2002

Organic Chemistry Chemist – Performs analyses of soil and water samples for volatile organic compounds; operates GC and GC/MS instruments; interprets and reports data.

JUN 1998 - **Quality Coatings – Post Falls, ID**  
AUG 1998

Laboratory technician – Developed Chemical Hygiene Plan, standardized chemical solutions; conducted titrimetric analyses, controlled pH, temperature, and chemical concentrations of industrial processes.

JAN 1997 - **A.C. Data Systems – Post Falls, ID**  
AUG 1999

Mechanical assembly worker – Performed component soldering and mechanical assembly of panels and circuitry quality inspections, training, developed process documentation.

SEP 1993 - **North Idaho College – Coeur d'Alene, ID**  
AUG 1995

Lab Assistant – Prepared reagents for laboratory demonstrations, standardized chemical solutions, conducted chemical and equipment inventory, supervised students, set-up laboratory demonstrations

**EDUCATION:**

1997 - **North Idaho College – Coeur d'Alene, ID**  
1998

A.S. in Premedical Studies 1998

1994 - **University of Idaho – Moscow, ID**  
1996

B.S. in Chemistry 1996

1991 - **North Idaho College – Coeur d'Alene, ID**  
1995

A.S. in Chemistry 1995

SVL ANALYTICAL, INC.

**JUDY ASHCRAFT**

**PROFESSIONAL EXPERIENCE:**

NOV 1994 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Organic Chemistry Department Analyst – Analyzes samples for Pesticides, PCBs, Petroleum Hydrocarbons, TOC, TOX, and Ethylene Glycol; performs solid phase extractions, liquid/liquid extractions of soil, water, and waste.

1968 - **Minnesota Valley Testing Laboratories, Inc. - New Ulm, MN**  
1994

GLP Laboratory Technician – Performed organic extractions including liquid-liquid partition, solid phase extraction, gel permeation, and open column chromatography. Matrices included soil, water, plants, and food products. Performed routine record keeping and data entry as well as training lab personnel.

Previous positions with this employer included:

Soils Lab Assistant to the Nutrients and Minerals supervisor and experience in the inorganic lab covering areas such as domestic & waste water, plant nutrients & minerals, feed nutrients, and used oil analysis.

Training included: techniques in "Good Laboratory Practices Standards" (GLP) as delineated in 40 CFR, Part 160 (US EPA), Laboratory Safety, Quality Assurance, and familiarity with the following instruments: color spectrophotometer, atomic absorption spectrophotometer, ultrasonic processor, electric kiln, flash point detector, analytical balances, pH meters, vacuum box, centrifuge, heating & distilling units, rotary evaporator, steam water bath, and gas chromatography (limited).

**EDUCATION:**

1968 **Mankato Commercial College - Mankato, MN**  
General Business Course work

SVL ANALYTICAL, INC.

**KEVIN HATHAWAY**

**PROFESSIONAL EXPERIENCE:**

MAR 1987 - **SVL Analytical, Inc. – Kellogg, ID**  
PRESENT

Inorganic Instrument Operator – Operates GFAA instruments; also trained in Ion Chromatography and Mercury analysis by Cold Vapor Atomic Absorption.

**EDUCATION:**

1993 - **North Idaho College – Coeur d' Alene, ID**  
1994

Basic Concepts in Chemistry

SVL ANALYTICAL, INC.

**ANNE L. SPRADLIN**

**PROFESSIONAL EXPERIENCE:**

MAR 1997 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

ICP Spectroscopist – Operates ICP utilizing standard methods of analysis such as SW846 as well as USEPA CLP procedures.

1993 - **Quanterra Environmental Services - Richland, WA**  
1997

Chemist III – Operated radiation detection instrumentation such as Alpha Spectrometers, Gamma detectors, Gas Proportional Counters and Liquid Scintillation analyzers. Utilized computers in acquisition and reporting of data and performed data review.

1985 - **National Environmental Testing, Inc. - Dallas, TX**  
1993

Supervisor Metals Department – Supervised analysts, delegated work distribution, implemented company QA/QC program, evaluated accuracy of reported data, trained new employees. Analyzed for metals utilizing Thermo Jarrell-Ash ICP, Perkin Elmer 5000 ICP, Perkin Elmer 5000 AA, Hitachi Z-9000 and Perkin Elmer 3030 graphite furnaces. In addition, performed Cold-vapor Mercury Analyses, sample prep, routine maintenance and troubleshooting of instrumentation. Also performed Wet Chemistry analyses for two years; parameters included BOD, COD, cyanide, TPH and many other common wet chem analyses. Interpreted and reported data.

1984 - **Environment Protection Laboratories - St. Cloud, MN**  
1985

Performed wet chemistry and microbiological analyses.

**EDUCATION:**

1979 - **Concordia College, Moorhead, MN**  
1981

General Studies

1981 - **Saint Cloud State University - Saint Cloud, MN**  
1983

B.A. Biology (with emphasis in Microbiology)

**SVL ANALYTICAL, INC.**

**ANN MARIE COSTELLO**

**PROFESSIONAL EXPERIENCE:**

NOV 1991 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Inorganic Instrument Operator – Analyzes samples by Ion Chromatography; operates GFAA using USEPA CLP procedures. Also trained in the operation of the ICP instrument for CLP samples of both water and soil matrices.

1979 - **Energy Laboratories - Billings, MT**  
1980

Lab Technician – Plant and soil analysis using classical chemistry and AA techniques.

1975 - **Chen Northern - Billings, MT**  
1977

Lab Technician – Plant and soil analysis using classical chemistry and AA techniques.

1972 - **Montana State University Plant Research Center - Bozeman, MT**  
1975

Lab Technician – Plant and soil analysis using classical chemistry and AA techniques.

**EDUCATION:**

1967 - **Montana State University, Bozeman, MT**  
1971

B.S. Microbiology

SVL ANALYTICAL, INC.

**DANNY J. SEVY**

**PROFESSIONAL EXPERIENCE:**

- 1996 -  
PRESENT      **SVL Analytical, Inc. - Kellogg, ID**  
  
Inorganic Instrument Operator -- Performs metals analysis by ICP and GFAA using SW846 and CLP methodology.
- 1994 -  
1996      **SVL Analytical, Inc. - Kellogg, ID**  
  
Classic Chemistry Analyst -- Performed classical Wet Chemistry analyses on water and soil samples using CLP procedures. This included the preparation and analysis of Cyanide and Nitrate/Nitrite (as N) tests for soil and water samples.
- 1988 -  
1994      **SVL Analytical, Inc. - Kellogg, ID**  
  
Instrument Operator -- Analyzed samples using Cold Vapor Atomic Absorption and Ion Chromatography
- APR 1987 -  
1988      **SVL Analytical, Inc. - Kellogg, ID**  
  
Laboratory Technician -- Performed inorganic sample preparation and operated CVAA and GFAA instruments.

**EDUCATION:**

- 1989 -  
1990      **North Idaho College - Coeur d' Alene, ID**  
  
Chemistry and Mathematics courses

SVL ANALYTICAL, INC.

**KAY JOHNSON**

**PROFESSIONAL EXPERIENCE:**

JUN 1992-  
PRESENT      **SVL Analytical, Inc. - Kellogg, ID**

Fire Assayer – Performs fire assays of ore and mineral samples; analyzes ore and mineral samples for metal content by atomic absorption

1967- 1969      **Idaho Bureau of Mines and Geology – Moscow, ID**

Lab Technician – performed sample preparation and chemical analysis

**EDUCATION:**

1964-  
1965      **Whitworth College – Spokane, WA**

Evening courses

1959-  
1960      **Spokane Community College – Spokane, WA**

Dental Technician program

SVL ANALYTICAL, INC.

**ARLENE FATTU**

**PROFESSIONAL EXPERIENCE:**

MAR 1989 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Inorganic Instrument Technician – Performs analyses for Mercury with CETAC instrument;  
inorganic sample preparation.

**EDUCATION:**

1971 - **University of Idaho - Moscow, ID**  
1975

B. S. Home Economics (chemistry courses)

SVL ANALYTICAL, INC.

**MELBA BENCICH**

**PROFESSIONAL EXPERIENCE:**

FEB 1988 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Data Processing and Reporting Coordinator – Supervises data reporting, utilizing USEPA CLP procedures for deliverables and compliance screening.

1984 - **Shoshone Insurance - Kellogg, ID**  
1988

Duties included accounting, customer service relations and updating manuals.

1982 - **Time To Travel - Wallace, ID**  
1984

Travel Consultant

1974 - **The Bunker Hill Company - Kellogg, ID**  
1981

Data Control Analyst

**EDUCATION:**

1967 - **North Idaho College - Coeur d' Alene, ID.**  
1968

General Studies

1980 **International Correspondence School**

Mathematics

SVL ANALYTICAL, INC.  
**RUSSELL L. ALLRED**

**PROFESSIONAL EXPERIENCE:**

SEP 1987 - **SVL Analytical, Inc. - Kellogg, ID**  
PRESENT

Programmer Analyst – Provides computer and systems analysis, maintenance and repair. Novell certified administrator, trained Novell certified internet professional. Service and maintain in-house phone switching equipment. Perform accounting audits and prepare company financial statements.

1981 - **Cook Lumber - Murray, UT**  
SEP 1987

Computer Analyst – Maintained a multi-user system that affected all aspects of the business and trained employee users.

**EDUCATION:**

1987 **Salt Lake Community College - Salt Lake City, UT**

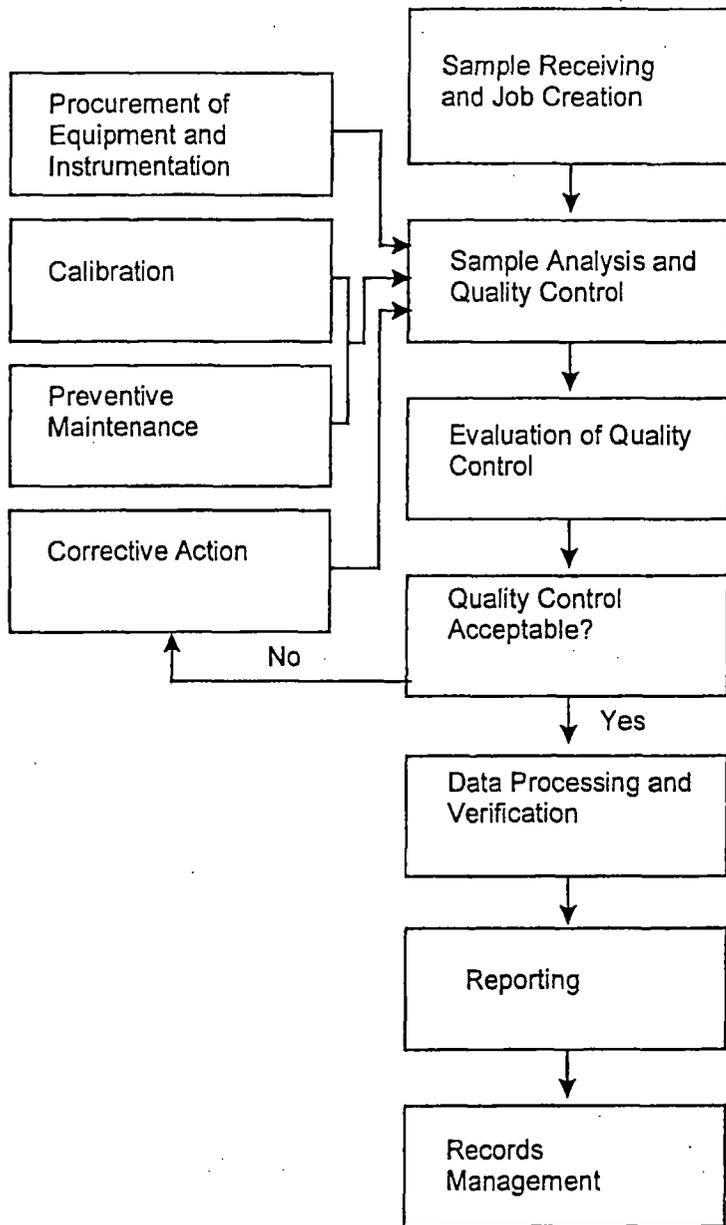
Computer Science

1978 - **University of Utah, Salt Lake City, UT**  
1986

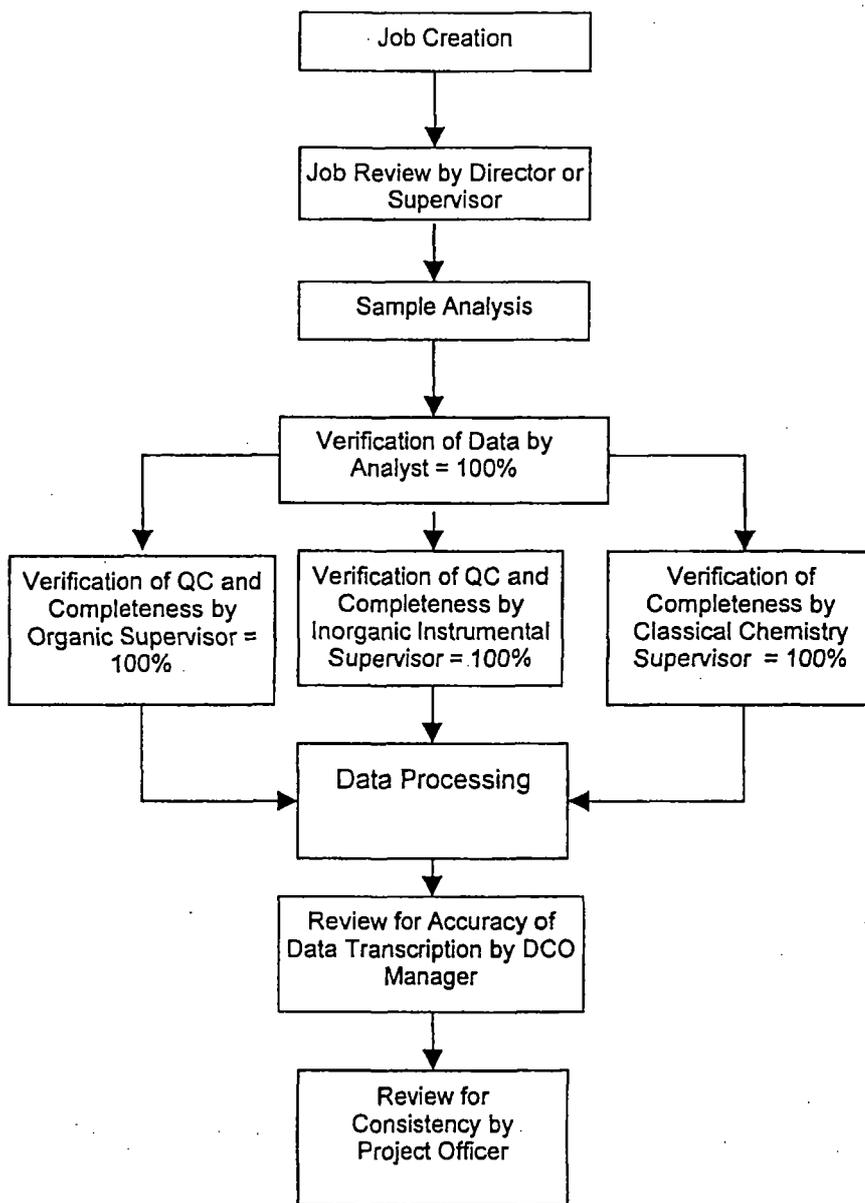
Computer Science



# 1.5 Laboratory Analysis Flow Chart



## 1.6 Data Review Flow Diagram



## 2. INSTRUMENTATION AND ANALYSIS

*SVL is equipped with state-of-the-art instrumentation, for all of your analytical needs*

### 2.1 INSTRUMENTS FOR TRACE METAL ANALYSIS

<b>INSTRUMENT</b>	<b>MANUFACTURER</b>	<b>MODEL</b>
Inductively Coupled Plasma Spectrometer	Perkin-Elmer	Optima
Inductively Coupled Plasma Spectrometer	Perkin-Elmer	Optima
Inductively Coupled Plasma/ Mass Spectrometer	Perkin-Elmer	ELAN 5000
Atomic Absorption Spectrometer with Graphite Furnace Atomizer	Varian	SpectrAA 300Z
Atomic Absorption Spectrometer with Graphite Furnace Atomizer	Varian	SpectrAA 300Z
Atomic Absorption Spectrometer with Graphite Furnace Atomizer	Varian	SpectrAA 400Z
Atomic Absorption Spectrometer with Graphite Furnace Atomizer	Varian	SpectrAA 40Z
Atomic Absorption Spectrometer with Graphite Furnace Atomizer	Varian	SpectrAA 20
Atomic Absorption Spectrometer with Vapor Generation Assembly	Varian	SpectrAA 20
Atomic Absorption Spectrometer with Vapor Generation Assembly	Varian	SpectrAA 20
Mercury Analyzer	CETAC	M-6000A

## 2.2 Instruments for Organic Analysis

INSTRUMENT	MANUFACTURER	MODEL
Gas Chromatograph with Dual ECD Detectors and Autosampler	Hewlett-Packard Hewlett-Packard	5890 HP 7673
Gas Chromatograph with FID and NPD Detectors and Autosampler	Hewlett-Packard Hewlett-Packard	5890A HP 7673A
Gas Chromatograph with FID Detector and Autosampler	Hewlett-Packard Hewlett-Packard	5890A HP 7673
Gas Chromatograph with PID and Hall Detectors and Liquid Sample Concentrator/Autosampler	Hewlett-Packard Tekmar	5890A LSC 2000/ ALS 2016
Gas Chromatograph with MS Detector and Purge and Trap Concentrator	Hewlett-Packard Tekmar	5890E with 5972 MS Purge and Trap
Gas Chromatograph with PID and ELCD Detector with Liquid Sample Concentrator/Autosampler	Hewlett-Packard OI	5890 4560/ MPM-16
Gas Chromatograph with MS Detector and Purge and Trap Concentrator	Hewlett-Packard Tekmar	5890 with 5971 MSD LSC 2000/ ALS 2016
Gas Chromatograph with MS Detector and Autosampler	Hewlett-Packard Hewlett-Packard	5890 7673
Gas Chromatograph with MS Detector	Hewlett-Packard	5890A with 5870 MSD
Gas Chromatograph with NPD and FPD Detectors And Autosampler	Agilent Agilent	6890A 7683
HPLC	Agilent	1050
Accelerated Solvent Extractor	Dionex	ASE200
Zero Head Space Extractor	Millipore	
Carbon Analyzer (TOC)	Shimadzu	TOC-5000A
Organic Halogen Analyzer (TOX)	MCI (Mitsubishi)	TOX-10

## 2.3 Instruments for Inorganic Analysis

<b>INSTRUMENT</b>	<b>MANUFACTURER</b>	<b>MODEL</b>
Ion Chromatograph	Dionex	2000i
Ion Chromatograph	Dionex	DX-100
Ion Chromatograph	Dionex	4000i
Automated Flow Analyzer with Autosampler	Alpkem	FS300
Automated Flow Analyzer with Autosampler	Alpkem	FS300
MIDI Distillation Unit	BSL	
MIDI Distillation Unit	BSL	
MIDI Distillation Unit	BSL	
Auto Titrator with Autosampler	Brinkmann	Titrimo 716
Auto Titrator with Autosampler	Brinkmann	Titrimo 716
UV/Visible Spectrophotometer	Bausch & Lomb	501
Turbidimeter	Hach	2100
COD Reactor	Hach	COD
COD Reactor	Hach	COD
pH Meter	Corning	150
pH/Ion Meter	Corning	450
Dissecting Microscope	Nikon	104
Polarizing Microscope	Nikon	106
Conductance Meter	YSI	32
Dissolved Oxygen Meter	YSI	50B
Elemental Analyzer	LECO	SC444

**2.4 Routine Analyses Performed**

<b>ANALYTE</b>	<b>METHOD</b>	<b>TECHNIQUE</b>
Aluminum	EPA 200.7, 6010B	ICP
Antimony	EPA 200.7, 6010B	ICP
Antimony	EPA 204.2, 7040	GFAA
Antimony	EPA 200.9	GFAA
Arsenic	EPA 200.7, 6010B	ICP
Arsenic	EPA 206.2, 7060A	GFAA
Arsenic	EPA 200.9	GFAA
Barium	EPA 200.7, 6010B	ICP
Beryllium	EPA 200.7, 6010B	ICP
Boron	EPA 200.7, 6010B	ICP
Cadmium	EPA 200.7, 6010B	ICP
Cadmium	EPA 213.2, 7131A	GFAA
Cadmium	EPA 200.9	GFAA
Calcium	EPA 200.7, 6010B	ICP
Chromium	EPA 200.7, 6010B	ICP
Chromium	EPA 218.2, 7191	GFAA
Chromium	EPA 200.9	GFAA
Cobalt	EPA 200.7, 6010B	ICP
Copper	EPA 200.7, 6010B	ICP
Gold	EPA 231.2	GFAA
Iron	EPA 200.7, 6010B	ICP
Lead	EPA 200.7, 6010B	ICP
Lead	EPA 239.2, 7420	GFAA
Lead	EPA 200.9	GFAA
Magnesium	EPA 200.7, 6010B	ICP
Manganese	EPA 200.7, 6010B	ICP

**SVL ANALYTICAL, INC.**

<b>ANALYTE</b>	<b>METHOD</b>	<b>TECHNIQUE</b>
Mercury	EPA 245.1, 7470A, 7471A	CVAAs
Nickel	EPA 200.7, 6010B	ICP
Potassium	EPA 200.7, 6010B	ICP
Selenium	EPA 200.7, 6010B	ICP
Selenium	EPA 270.2, 7740	GFAA
Silica	EPA 200.7	ICP
Silver	EPA 200.7, 6010B	ICP
Silver	EPA 272.2, 7761	GFAA
Sodium	EPA 200.7, 6010B	ICP
Strontium	EPA 200.7, 6010B	ICP
Thallium	EPA 200.7, 6010B	ICP
Thallium	EPA 279.2, 7840	GFAA
Tin	EPA 200.7, 6010B	ICP
Titanium	EPA 200.7, 6010B	ICP
Vanadium	EPA 200.7, 6010B	ICP
Zinc	EPA 200.7, 6010B	ICP
Acidity	SM 2310B	Titration
Alkalinity	SM 2320B	Titration
Ammonia	EPA 350.3	Ion Specific Electrode
Biochemical Oxygen Demand	SM 5210B	D.O. Meter
Bromide	EPA 300.0	Ion Chromatography
Chemical Oxygen Demand	EPA 410.4	Colorimetry
Chloride	EPA 300.0	Ion Chromatography
Corrosivity	SM 2330 (B)	Langlier Index
Cyanide, Total	EPA 335.4	Automated Colorimetry
Cyanide, Total	EPA 335.2, 9012A	Automated Colorimetry
Cyanide, WAD	SM 4500 CN (I)	Automated Colorimetry

**SVL ANALYTICAL, INC.**

<b>ANALYTE</b>	<b>METHOD</b>	<b>TECHNIQUE</b>
Fluoride	EPA 300.0	Ion Chromatography
Fluoride	EPA 340.2	Ion Specific Electrode
Hardness	SM 2340B	ICP Sum
Hexane Extractable Materials	EPA 1664	Gravimetric
Nitrate	EPA 300.0	Ion Chromatography
Nitrate	EPA 353.2	Automated Colorimetry
Nitrate + Nitrite	EPA 353.2	Automated Colorimetry
Nitrite	EPA 300.0	Ion Chromatography
Nitrite	EPA 353.2	Automated Colorimetry
Oil & Grease	EPA 1664	Gravimetric
ortho-Phosphate	EPA 365.1	Colorimetry
pH	EPA 150.1	Electrometric
Phenolics, Total	EPA 420.1	Colorimetric
Phosphate, Total	EPA 365.2	Persulfate Digestion
Residue, Filterable	EPA 160.1	Gravimetric
Residue, Filterable	SM 2540C	Gravimetric
Residue, Nonfilterable	EPA 160.2	Gravimetric
Specific Conductance	EPA 120.1	Wheatstone Bridge
Sulfate	EPA 300.0	Ion Chromatography
Sulfide	EPA 376.1	Titrimetric
TCLP	EPA 1311	Extraction
Total Dissolved Solids	EPA 160.1	Gravimetric
Total Dissolved Solids	SM 2540C	Gravimetric
Total Kjeldahl Nitrogen	EPA 351.4	Ion Selective Electrode
Total Organic Carbon	EPA 415.1	Combustion
Total Organic Halides	EPA 450.1	Adsorption-Pyrolysis, Titrimetric
Total Suspended Solids	EPA 160.2	Gravimetric

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<b>ANALYTE</b>	<b>METHOD</b>	<b>TECHNIQUE</b>
Aromatic Volatile Compounds	EPA 602	GC/PID
Organochlorine Pesticides and PCBs	EPA 608	GC/ECD
Organochlorine Pesticides	EPA 8081A	GC/ECD
PCBs	EPA 8082	GC/ECD
Semivolatile Organic Compounds	EPA 625	GC/MSD
Semivolatile Organic Compounds	EPA 8270C	GC/MSD
Volatile Organic Compounds	EPA 524.2	GC/MSD
Volatile Organic Compounds	EPA 624	GC/MSD
Volatile Organic Compounds	EPA 8260B	GC/MSD
Halogenated Organic Compounds	EPA 601	GC/ELCD
Volatile Organic Compounds	EPA 8021B	GC/PID/ELCD
Total Petroleum Hydrocarbons-- Gasoline	EPA 8015	GC/FID
Total Petroleum Hydrocarbons-- Diesel	EPA 8015	GC/FID

### 3. ANALYTICAL PROCEDURES

*SVL Analytical, Inc. uses established procedures whenever possible*

Analysis of samples is performed according to SVL Standard Operating Procedures (SOPs). The SOPs are created using established procedures such as those referenced in the following section.

#### 3.1 References

Methods for Chemical Analysis of Water and Wastes, revised March 1983, EPA-600/4-79-020.

Methods for the Determination of Organic Compounds in Drinking Water Supplement I, EPA/600/4-88/039, July 1990.

Methods for the Determination of Organic Compounds in Drinking Water Supplement III, EPA/600R-95-131, August 1995.

Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW 846), Third Edition, Update III, December 1996.

Standard Methods for the Examination of Water and Wastewater, 16th Edition, 1985

Standard Methods for the Examination of Water and Wastewater, 19th Edition, 1995.

ASTM Book of Standards, part 31

USEPA CLP Inorganic Statement of Work ILM04.0.

## 4. ETHICS AND DATA INTEGRITY AGREEMENT

*We are committed to providing our clients with accurate and defensible data*

SVL Analytical, Inc. is committed to providing its clients with accurate and defensible data and meeting all client requirements for data quality and integrity. To achieve this commitment, and as a condition for employment, all employees agree to follow SVL's policy regarding ethics and data integrity which is characterized in the items listed below.

All work performed shall be in accordance with appropriate work order agreements, specified methods, SOP's, and contracts.

All reported data, including analysis dates and times, shall represent actual values obtained and are not modified, or manipulated in any manner which is not described in the referenced method.

Analysts performing technical methods in the name of SVL shall not represent work which was performed by other individuals as their own.

Client results shall be kept strictly confidential and released to a third party only with written permission by the client.

Violation of these standards is grounds for disciplinary action as stated in section II of SVL's Employee Handbook, including termination.

## **5. QUALITY ASSURANCE AND QUALITY CONTROL<sup>o</sup>**

*The procedures outlined in this manual are the basis of the SVL Analytical, Inc. quality assurance plan (QAP)*

SVL recognizes that an effective and vigorously pursued quality program is key to providing analytical data which is legally defensible, technically accurate, and scientifically meaningful.

At SVL, quality control begins once the objectives of a survey are defined and proceeds through data reporting. Control procedures are defined for every step of the program and detailed in current standard operating procedures (SOPs).

SVL realizes that without these controls in all phases of the laboratory and analytical process, data becomes suspect and hence, of less value to our client. Therefore, SVL is dedicated to providing data of the highest quality, usability, and defensibility for every project we undertake.

### **5.1 Quality Assurance Policy and Objectives**

The primary emphasis of the QAP is twofold. The first of these is to define quality control procedures for all activities that take place in the laboratory. These include the following: receipt, handling, and storage of samples; preparation and maintenance of standards, reagents, gases, and water; calibration and maintenance of analytical equipment; performance, and evaluation of analytical methodologies (in conformance with the parameters defined by the appropriate regulatory agency; and the compilation and generation of reportable data packages.

The other emphasis of the QAP is to characterize the documentation practices utilized in all facets of the laboratory process. The objective is to provide a uniform basis for instrument maintenance, document control, analytical methodologies, data generation, quality assurance, and quality control.

The procedures outlined in this manual are the basis of the SVL Analytical Quality Assurance Plan (QAP).

### **5.2 Quality Assurance Management**

SVL employs one full time Quality Assurance Coordinator who reports directly to the President and CEO, providing independence from the routine operation of the individual departments of the laboratory. The Quality Assurance Coordinator is responsible for the management and implementation of the quality assurance program. He is responsible for monitoring the overall adequacy of the program as well as determining departmental conformance to the QA program. The QA Coordinator is responsible for recommending corrective actions as necessary.

In addition, the Quality Assurance Coordinator develops quality control programs; monitors quality assurance activities to determine conformance with policies and procedures; evaluates and maintains records of data quality and other pertinent performance information; and coordinates investigations of quality problems. Supervisors are responsible for seeing that their staff receive adequate training in and follow the specific procedures outlined in this QAP.

## 5.3 Sample Collection and Handling

This section describes the quality control procedures to be followed in the collection and handling of samples for SVL. These procedures are recommended to all clients submitting samples for chemical analysis. Glassware preparation is included in this section because it is an integral part of any sampling program. It is assumed that the objectives of a study for which samples are to be collected have been stated and the number of samples, types of samples, frequency of collection, and duration of the sampling program have been established. Finally, it is assumed that all personnel involved in sample acquisition are aware of the above factors.

If utilized, the procedures characterized here result in more confidence in the data produced and the samples are processed more efficiently. The result of standardizing sample collection and handling procedures is less confusion for the project manager, field personnel, and laboratory staff.

The most important aspects of quality control for sample collection and handling are sample integrity and representivity.

### 5.3.1 Sample Integrity

Sample preservation is critical for sample integrity given the potential for transportation delays and hold ups. Chemical reactions may occur and some chemical species begin to change upon sample collection. Unfortunately, for most samples immediate analysis is neither economically feasible or logistically possible. Although no miracle chemical preservative valid for every parameter exists, SVL strongly recommends the preservation methods, container type, sample size and estimated maximum holding times for collection of water and wastewater samples summarized in Table 5-1.

Solid samples are best preserved by refrigeration at  $4\text{ }^{\circ}\text{C} \pm 2\text{ }^{\circ}\text{C}$ . Analysis begins as soon as possible after lab receipt of samples. SVL does its utmost to ensure that all holding times are met for water samples as listed in Table 5-1. A complete record is maintained on each sample to provide a history of handling from the time of collection through analysis and sample disposal.

**Table 5-1 Recommendation for Sampling and Preservation of Aqueous Samples**

Analysis	Vol. Req. (mL)	Container	Preservative	Holding Time
<b>PHYSICAL PROPERTIES</b>				
Color	50	P,G <sup>1</sup>	Cool 4 °C	48 Hours
Conductance	100	P,G	Cool 4 °C	28 Days
Hardness	100	P,G	HNO <sub>3</sub> to pH<2	6 Months
Odor	200	G only	Cool 4 °C	24 Hours
pH	25	P,G	None Req.	Analyze Immediately
Temperature	1000	P,G	None Req.	Analyze Immediately
Turbidity	100	P,G	Cool 4 °C	48 Hours

Table 5-1 Recommendation for Sampling and Preservation of Aqueous Samples

Analysis	Vol. Req. (mL)	Container	Preservative	Holding Time
<b>RESIDUES</b>				
Filterable (TDS)	100	P,G	Cool 4 °C	7 Days
Non-Filterable (TSS)	100	P,G	Cool 4 °C	7 Days
Total	100	P,G	Cool 4 °C	7 Days
Volatile	100	P,G	Cool 4 °C	7 Days
Settleable Matter	1000	P,G	Cool 4 °C	48 Hours
<b>METALS</b>				
Dissolved	200	P,G	Filter on site HNO <sub>3</sub> to pH<2	6 Months
Suspended	200	P,G	Filter on site	6 Months
Total	100	P,G	HNO <sub>3</sub> to pH<2	6 Months
Chromium (VI)	200	P,G	Cool 4 °C	24 Hours
Mercury, Dissolved	100	P,G	Filter HNO <sub>3</sub> to pH<2	28 Days
Mercury, Total	100	P,G	HNO <sub>3</sub> to pH<2	28 Days
<b>INORGANIC</b>				
Acidity	100	P,G	Cool 4 °C	14 Days
Alkalinity	100	P,G	Cool 4 °C	14 Days
Bromide	100	P,G	None Req.	28 Days
Chloride	50	P,G	None Req.	28 Days
Cyanide	500	P,G	Cool 4 °C NaOH to pH>12	14 Days
Fluoride	300	P	None Req.	28 Days
Iodide	100	P,G	Cool 4 °C	24 Hours
Ammonia	400	P,G	Cool 4 °C H <sub>2</sub> SO <sub>4</sub> to pH<2	28 Days
Total Kjeldahl Nitrogen	500	P,G	Cool 4 °C H <sub>2</sub> SO <sub>4</sub> to pH<2	28 Days
Nitrate plus Nitrite	100	P,G	Cool 4 °C H <sub>2</sub> SO <sub>4</sub> to pH<2	28 Days
Nitrate	100	P,G	Cool 4 °C	48 Hours
Nitrite	50	P,G	Cool 4 °C	48 Hours
Ortho-Phosphate Dissolved	50	P,G	Filter on site Cool 4 °C	48 Hours
Total Phosphate	50	P,G	Cool 4 °C H <sub>2</sub> SO <sub>4</sub> to pH<2	28 Days
Total Dissolved Phosphate	50	P,G	Filter on site Cool 4 °C H <sub>2</sub> SO <sub>4</sub> to pH<2	24 Hours
Silica	50	P only	Cool 4 °C	28 Days
Sulfate	50	P,G	Cool 4 °C	28 Days
Sulfide	500	P,G	Cool 4 °C add 2 mL zinc acetate plus NaOH to pH>9	7 Days
Sulfite	50	P,G	None Req.	Analyze Immediately

**Table 5-1 Recommendation for Sampling and Preservation of Aqueous Samples**

<b>Analysis</b>	<b>Vol. Req. (mL)</b>	<b>Container</b>	<b>Preservative</b>	<b>Holding Time</b>
<b>ORGANICS Group I</b>				
COD	50	P,G	Cool 4 °C H <sub>2</sub> SO <sub>4</sub> to pH<2	28 Days
Oil & Grease	1000	G only	Cool 4 °C H <sub>2</sub> SO <sub>4</sub> to pH<2	28 Days
Organic Carbon	25	P,G	Cool 4 °C H <sub>2</sub> SO <sub>4</sub> or HCl to pH<2	
Phenolics	500	G only	Cool 4 °C H <sub>2</sub> SO <sub>4</sub> to pH<2	28 Days
MBAS	250	P,G	Cool 4 °C	48 Hours
<b>ORGANICS Group II</b>				
Volatile Organics 8010/8020/8260	2x40ml/ 1x4oz	G,T	Cool 4 °C HCl pH<2	14 days
Semi-volatile Organics 8270/8080	1 L / 1x8 oz	G,T	Cool 4 °C No Preserv.	7/14 days
TPH - Total Petro. Hydrocarbons				
THP-Gas	2x40 mL/ 1x4 oz	G,T	Cool 4 °C	14 days
TPH-Diesel	1 L / 1x8 oz	G,T	Cool 4 °C	14 days
TPH-IR	1 L / 1X8 oz	G,T	Cool 4 °C	14 days

**NOTES:** - <sup>1</sup>Plastic (P), Glass (G), Teflon-lined cap (T). For metals, polyethylene with a polypropylene cap (no liner) is preferred.

**Preservation:** - Sample preservation should be performed immediately upon sample collection. For composite samples each aliquot should be preserved at the time of collection. When use of an automated sampler makes it impossible to preserve each aliquot, the samples may be preserved by maintaining at 4 °C until compositing and sample splitting is completed.

**Holding Time:** - Samples should be analyzed as soon as possible after collection. The times listed are the maximum times that samples may be held before analysis and still be considered valid.

### 5.3.2 Sample Representivity

Sampling precision is determined in the initial phase of a long-term sampling program. It is checked thereafter with a single duplicate sample per batch of samples, and usually with every sample delivery group.

Field blanks allow identification of systematic and random sample contamination which may result from the sampling equipment, storage containers, sampling agents, or chemicals added to preserve samples. This contamination can be checked by filling a randomly selected sample container with distilled water and the appropriate chemical preservative. Field blanks are analyzed as samples and therefore, are treated exactly as samples: all aliquots, preservation, filtration, storage and handling procedures are performed as if the field blanks are samples. To achieve accurate and meaningful data, field blank "sample" containers are filled at the sampling site, not after returning to the field laboratory.

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Two general classifications of contamination exist; random and systematic. Random contamination causes imprecision in analytical results as noted by significant differences between results of duplicate analyses. Systematic contamination generally results in consistent shifts in baseline concentrations; this is demonstrated through the use of field blanks. Systematic contamination is much easier to eliminate and to address when interpreting the data. The best way to restrict contamination of the systematic type is to treat every sample, blank, or replicate identically. The vast majority of contamination of this type occurs at trace levels.

Sources of possible sample contamination exist including the following: contaminated sample containers; unclean glassware and filters; Impure solvents and reagents; use of cleaning products inappropriate for the proposed analysis; inadequate rinsing of glassware during the cleaning process; and inadequate pre-sample rinsing (the sample bottle should be rinsed two to three times with small volumes of the sample before the bottle is filled to overflowing). Pre-sample rinsing is not possible for certain parameters when pre-preserved bottles are used. Hair, tobacco smoke, and dust are also appreciable sources of contamination, so sampling should be conducted in as careful a manner as possible.

Before filtering samples, the filter paper should be rinsed with deionized or distilled water and with a small portion of sample. The filtration apparatus should also be rinsed with deionized or distilled water between samples. Handle filter paper only on the edge, using appropriate forceps (plastic for trace metals analysis, metal for organic analysis).

Use the proper sample container for the parameter specified. Trace metals samples must not come into contact with any metallic surface; samples for organic analysis must not come into contact with any plastic surface.

### **5.3.3 Cleaning Procedures for Sample Containers**

Immerse glassware in a solution of synthetic detergent. Scrub it with a brush, rinse it several times with tap water, and then with deionized water. Glassware for samples to be analyzed for trace metals may also require treatment with hot nitric and hydrochloric acids (see SOP 4013). Glassware for samples to be analyzed for organic analysis may also require solvent rinses and baking (see SOP 3001).

### **5.3.4 Sample Receipt and Handling**

Sample receipt and handling procedures at SVL are based upon the CLP guidelines to ensure efficient generation of high quality analytical results. SVL SOPs cover all sample handling procedures and are easily accessible to the sample custodian and staff.

#### **5.3.4.1 Requesting Analysis**

A request for analysis shall be completed by the field personnel. It is imperative that the Order for Analytical Services (SVL's is in the form of a chain-of-custody, see example located in Appendix A) or an equivalent be provided which defines analytical requirements and enables the lab to meet sample holding times.

#### **5.3.4.2 Chain-of-Custody**

Laboratory custody conforms to procedures established for the USEPA Contract Laboratory Program (CLP). Improper sample and data handling and inadequate chain-of-custody procedures affect the credibility and acceptability of analytical results, regardless of their accuracy and precision. Therefore, it is essential that all samples be properly collected, handled, and analyzed. It is imperative that a chain-of-custody be maintained to document the proper processing of samples, from the time of collection to the time of analysis. Use of a Chain-of-Custody or an equivalent form is required to document this process.

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All pertinent information is obtained and recorded on the chain-of-custody (as filled out by the field/sample collectors). At a minimum, the following information is recorded: sampling conditions, date and time of sample collection, type of sampling device, type of sample container, number and size of samples and other information required by the laboratory for proper sample handling and analysis. To prevent tampering, sample seals may be used.

**5.3.4.3 Sample Handling**

SVL is in communication with a client designated individual (designee) as necessary throughout the process of sample scheduling, shipment, analysis and data reporting to ensure that samples are properly processed. This communication includes immediate notification of the designee of anomalies and irregularities with samples or sample paperwork which is received by SVL and discrepancies or problems encountered in sample analysis that will affect the data produced.

A temperature reading is taken by the SVL sample custodian for all sample shipping containers (coolers) upon initial receipt and opening. Each sample is checked for visible damage and the presence of an intact custody seal. Each sample is assigned a unique sample identification number batched with other samples which have been received from the same client and assigned a Job number (for details, please see the next paragraph). After initial sample check-in and generation of sample labels, additional sample/client information is logged into SVL's laboratory information management system (LIMS). Samples are stored in a secured area.

100001 Client: Client Sample ID SVL JOB #: 90001 Recv Date: 01/15/00
--

**Figure 5-1 Sample Label**

Client Sample ID SVL #: 00001 Matrix: WATER JOB #: 60001 Case #: XXXX SDG #: XXXXXXXXXXXX ICAP ANALYZE BY: 02/2/00
--

**Figure 5-2 Digestate Label**

Each batch of samples received at SVL is given a unique job number (e.g., "90001"). This job number remains with the sample throughout the analytical process. Each sample is also given a unique, sequential laboratory identification number (e.g., "200001"). The sequential nature of the laboratory identification numbers allows for quick identification of job and sample status during the analytical process. Samples are labeled with sample and Job identification numbers before being stored. For labeling examples, see Fig. 5-1. Identification labels are also affixed to digestates which contain information pertinent to analysis (for example, see Fig. 5-2).

**5.3.4.4 Sample Storage and Security**

Samples which require refrigeration are stored in a walk-in cooler at  $4 \pm 2$  °C, except at times of sample preparation or analysis. Samples which do not require refrigeration are stored in a sample storage annex. Samples are retained at SVL for a minimum of 30 days (or longer if required by the client) after a data report is issued to the client. At the end of the specified period, samples are returned to the client or discarded according to the procedures outlined in the SOP SVL 1001.

## 5.4 Reagents, Standards, Gases, and Water

In an effort to keep contamination to a minimum, SVL recognizes the importance of using quality materials in the analytical process. Detailed below are descriptions of the procedures practiced at SVL to maintain contaminant free reagents, standards, gases, and water.

### 5.4.1 Reagent Chemicals

The most significant source of sample contamination for trace metal and organic analyses results from the acids and solvents used in digestion and extraction, respectively. To minimize this potential for contamination, SVL uses BAKER INSTRA-ANALYZED™ or better grade reagents for all environmental analyses. Solvents used for organic analyses are of GC grade purity.

Analysts are trained in the proper procedures for handling reagents to avoid accidents and contamination. The practice of these few simple rules will prevent bulk contamination: scoopulas, spatulas, pipettes are never used in reagent bottles; an approximate amount of reagent required is dispensed into a secondary vessel; reagents are never dispensed directly from the reagent container; and excess reagent is discarded, not returned to the bottle.

### 5.4.2 Standards

The sources and quality of all standards, reagents, and chemicals used by SVL are documented. A record is maintained which indicates the name of the person preparing a standard, the source of the standard being used, weight or volume measurements, units, and dilutions. A separate laboratory equipped with sink and hood is dedicated to standard preparation. Standards are not stored in either the standard preparation or sample storage areas.

External reference standards are routinely obtained from commercial sources. A Certificate of Analysis is required. These standards are used to check and document the concentration of calibration standards and for method validation.

### 5.4.3 Laboratory Gases

All carrier, oxidant, and fuel gases used by SVL meet or exceed instrument manufacturers' specifications. Gases are stored in a remote, secure area of the laboratory. Appropriate precautions are taken to prevent attaching incorrect cylinders to manifold systems. Each manifold is labeled and used for one type of gas only. Carrier gas supply lines for organic analyses include in-line purifier traps.

### 5.4.4 Laboratory Water

The primary general use water in the laboratory is furnished by a reverse osmosis system followed by a micropore filter with an ion-exchange resin cartridge. This satisfies the specifications of ASTM Type II water. When Type I (16.67 MΩ-cm) water is required, SVL uses a four-cartridge ion-exchange system. Reagent water used for organic analyses is obtained via a Nano-Pure™ water purifier system. This water source is regularly screened for method specific contaminants.

## **5.5 Calibration and Maintenance of Analytical Equipment**

The following are descriptions of key instruments of concern which detail the routine calibration and maintenance procedures employed at SVL.

### **5.5.1 Analytical Balances**

The calibration of each balance is checked each day of use with a single class "A" weight and weekly with a set of three class "A" weights. The balances are checked monthly with three Class "S" weights. They are calibrated annually by an independent contractor. Upon completion of this annual calibration, a calibration status label is affixed to each balance.

### **5.5.2 UV/Visible Spectrometers**

Spectrometers are operated in accordance with the manufacturer's instructions. Calibration of these instruments is performed annually by an independent contractor. In addition the following steps are taken to ensure instrument control: Instruments are checked for proper wavelength and optical alignment, all absorption cells are optically matched and kept scrupulously clean, free of scratches, fingerprints, smudges, and evaporated film residues. Method specific verification or confirmation is performed as prescribed by each method.

### **5.5.3 Atomic Absorption Spectrometers**

Maintenance of Atomic Absorption Spectrophotometers is performed according to manufacturer's recommendations and recorded in an instrument specific maintenance logbook. Calibration curves are established from analysis of three standards. The initial calibration verification (ICV) is made from a second source standard. A continuing calibration blank (CCB) and a continuing calibration verification (CCV) are analyzed at a frequency of 10%.

### **5.5.4 Inductively Coupled Plasma Spectrometers**

Maintenance of the Inductively Coupled Plasma Spectrometers is performed according to manufacturer's specifications and recorded in an instrument specific logbook. The calibration procedure includes the establishment of a two point calibration curve, a CCB, CCV, and a second source ICV. Check samples are performed at a frequency of 10%.

### **5.5.5 Ion Chromatographs**

The Ion Chromatographs are operated in accordance with manufacturer's instructions. The instrument is calibrated with a minimum of four standards after maintenance of the instrument and after significant retention time drift. The calibration curve is verified daily with a standard from an independent source. In addition, a CCB and a CCV are performed at a frequency of 10%.

### **5.5.6 Gas Chromatographs**

Operation and maintenance of the various Gas Chromatographs are detailed in standard operating procedures (SOPs). Recommended manufacturer's maintenance schedules are followed and documented in the instrument-specific logbooks. A routine GC & GC/MS calibration consists of: an initial multi-point calibration to establish the calibration curve, a daily or continuing calibration to verify the calibration, and a calibration verification at the end of the analytical sequence. The frequency of the continuing calibration for the GC is, at a minimum, once every twenty samples. Continuing calibration for the GC/MS occurs at least every twelve hours.

## 5.6 Quality Control Parameters

SVL offers three levels of data report packages. A Level 1 report consists of analytical results; associated QC data are not included in this report. A Level 2 report consists of a standard report of analytical results with associated QC data (blank, replicate, spike, and control standard, as appropriate). A Level 3 report is virtually identical to a USEPA CLP data package.

### 5.6.1 Blanks

Preparation blanks are analyzed with every batch of twenty or fewer samples or each matrix type, whichever is more frequent. A preparation blank consists of laboratory pure water that is processed through all procedures, materials, and labware used for sample preparation and analysis. In cases of non-aqueous samples, reagent blanks serve as preparation blanks. Sample batches that contain contaminated blanks are routinely re-prepared, if sufficient sample remains.

### 5.6.2 Laboratory Control Samples

A laboratory control sample (LCS) is a sample of known value, usually from a source different from the calibration standards, used to validate the analytical procedure. One LCS is analyzed with every batch of twenty or fewer samples or each matrix type, whichever is more frequent. Sample batches containing LCS's that are out of control limits are re-analyzed, if sufficient sample remains. Control limits for solid LCS's are set by the supplier. Water or other aqueous LCS's have control limits of 80% to 120%, or as specified in the standard operating procedure.

### 5.6.3 Sample Replicates

These are aliquots made in the laboratory of the same sample, each aliquot is treated exactly the same throughout the analytical method. The relative percent difference (RPD) between the values of the duplicates, as calculated below, is taken as a measure of the precision of the analytical method.

$$RPD = \frac{|S - D|}{(S + D) \div 2} \times 100$$

where RPD = Relative Percent Difference  
S = First Sample Value (original)  
D = Second Sample Value (duplicate)

One duplicate sample or matrix spike duplicate is analyzed with every batch of twenty or fewer samples or each matrix type, whichever is more frequent. The tolerance limit for RPD is typically less than 20%. However, the duplicate is also a measure of the homogeneity of the sample matrix. An abnormally high RPD may be an indication of a non-homogeneous sample.

### 5.6.4 Check Standards and Controls

A check standard is prepared in the same manner as a calibration standard. The concentration is usually mid-range for the specific calibration curve. Controls are used to validate an existing calibration curve, and also typically fall mid-range on the calibration curve. The control is from a different source than that of the calibration standards or check standard. The USEPA CLP program identifies a "control" as the "initial calibration verification standard" (ICV) and the "check standard" as the "continuing calibration verification standard" (CCV). Check standards are run at a frequency of 10%. The check standard provides information on the accuracy of instrumental performance and response consistency independent of sample matrix and preparation.

For organic analysis, a calibration check standard is analyzed at regular intervals as specified by the method, usually every twelve hours of run time. The results of the calibration check standard are evaluated to ensure that instrument calibration is within acceptable limits. This standard solution is prepared from the same reference materials as the initial calibration standards.

### 5.6.5 Matrix Spikes and Surrogates

A matrix spike is prepared by adding a known amount of a pure compound to the sample prior to digestion or extraction. The calculated percent recovery of the matrix spike is considered to be a measure of the relative accuracy of the total analytical method, i.e., sample preparation and analytical procedure.

An analytical spike is prepared by adding a known amount of analyte to a digestate or extract of a sample for which the analyte concentration has been determined. This spike reveals the interferences found in the prepared sample matrix. The calculated percent recovery of the analytical spike is considered to reflect the accuracy of the analytical procedure only. Both the matrix spike and the analytical spike are also an indication of the effect of the sample matrix on the ability of the methodology to detect the specific analyte. When no change in volume due to the spike occurs, it is calculated as follows:

$$\% \text{ Recovery} = \frac{(\text{SSR} - \text{SR})}{\text{SA}} \times 100$$

where SSR = Spiked Sample Result  
SR = Sample Result  
SA = Spike Added

Tolerance limits for percent recoveries are established by client data quality objectives, but are usually 80-120% or 75-125%. Matrix spike samples are prepared for every batch of twenty or fewer samples.

Surrogates measure extraction or preparation efficiency. They must be a compound not expected to be present in the sample. The recovery of a surrogate compound must meet the control limits specified in the standard operating procedure.

### 5.6.6 Low Level Standards

As detection limits continue to drop and risk-assessment based criteria are used more frequently, it is increasingly important to have reliable data near the instruments detection limit. Standards at the reporting limit are employed to better assess the quality of data at these concentrations.

### 5.6.7 Interference Check Samples

For analytes determined by ICP spectroscopy, an interference check sample (ICS) is analyzed at the beginning and at the end of an analysis sequence. This sample consists of elements (usually Ca, Mg, Al, and Fe) at elevated levels to check for interferences due to common matrix elements. In cases where no analyte is present in the ICS, instrumental values should be  $\pm 5x$  the IDL, otherwise the instrumental value should be within  $\pm 20\%$  of the true value.

## **5.6.8 Completeness and Usability**

Completeness describes the percentage of measurements that meet quality control acceptance criteria for requested determinations. Percentage completeness is defined by client data quality objectives, but SVL strives for 100% completeness of calibration verification, laboratory control samples, blanks, interference check samples, and low-level standards. For spikes, duplicates, duplicate spikes, and other QC samples that are matrix dependent, SVL follows CLP guidelines to qualify data. Clients may define more rigid acceptance limits and corrective action. A completeness criteria of 90% is used for aqueous matrices, excluding Sb and Ag.

Usability describes the percentage of measurements that can be used for making decisions based on reported values. In many cases, estimated values are sufficient to characterize certain analytes in a sample. We believe the client is the best judge in interpreting the usability of their data and therefore make no attempt to set guidelines for this parameter.

## **5.6.9 QA Reports**

The QA Coordinator shall prepare a written report to the Laboratory Director and technical staff on a quarterly basis. The report will review recurring QA issues, discuss performance evaluation samples, summarize the findings from any internal audits, and summarize issues regarding state accreditations or arising from site visits. In addition, the report will cover recent modifications in QA policy and general lab practices.

## **5.6.10 Control Charts**

Control charts are maintained for Laboratory Control Samples for selected analytes. A standard X bar control chart is used to plot LCS results. Upper and lower warning limits of  $\pm 2s$  (where  $s$  equals standard deviation) and upper and lower control limits of  $\pm 3s$  are calculated with no less than fifteen measurements. An analytical run is considered out of control when: any one point is outside control limits or when any obvious cyclic pattern is seen in the points.

## **5.7 Audits**

The success of any QA program is driven by its ability to monitor the effectiveness of the quality systems in practice.

### **5.7.1 Performance Evaluations**

#### **5.7.1.1 Internal Performance Evaluations**

The Quality Assurance Coordinator conducts internal performance evaluations for commonly analyzed parameters. The PE samples are logged-in as double-blinds. Results will be reported to the Laboratory Director.

#### **5.7.1.2 External Performance Evaluations**

SVL participates in two WS and and two WP performance evaluation studies each year. We also participate in Soil, DMR-QA, and Underground Storage Tank PE studies. Copies of recent results are available upon request.

## 5.7.2 System Audits

The Quality Assurance Coordinator conducts an internal system audit each year. These audits provide a thorough overview of implementation of the Quality Assurance Plan within the laboratory.

The Quality Assurance Coordinator prepares an audit plan, with consideration of information gained during previous audits. The audit plan shall define participating auditors, applicable documents, the audit schedule, and the scope of laboratory activities to be audited. The Quality Assurance Coordinator shall use a written checklist of audit questions. Each question must be answered yes, no, or not applicable, and may be accompanied by appropriate comments.

At the close of the audit, a post-audit meeting shall be held to discuss the audit findings. The auditor can close a finding during this discussion if the laboratory staff can satisfactorily demonstrate that the finding is inappropriate.

The Quality Assurance Coordinator shall prepare an audit report for the Laboratory Director which documents *the following*: date and location of audit; persons contacted in the laboratory; laboratory operations audited; findings requiring corrective action; and a due date for the corrective action plan. Each finding must then be corrected and closed. The Quality Assurance Coordinator shall verify that corrective action has been successful by direct observation.

During the course of system audits, the Quality Assurance Coordinator shall be cognizant of recurring quality issues and trends which could affect quality. Recurring issues and trends should be addressed in the audit report. Correction for such events may require a review of the adequacy of the QAP. If the inherent problem lies within the QAP, the plan shall be amended through appropriate revision of Quality Assurance documents.

## 5.7.3 Data Audit

The QA Coordinator shall perform a data audit of at least 10 data packages each year. The purpose of the data audit is to alert the QA Coordinator to chronic problems and trends that may be developing. The QA Coordinator performs a complete review of the data contained in the report, verification of the chain-of-custody holding times, and quality control.

## 5.8 Corrective Action

When a QC parameter fails acceptance criteria during the course of analysis, the analyst or supervisor resolves the problem before reporting data. The supervisor may arrange for service or repair of instrumentation, if needed. For serious problems, the supervisor may report problems to the Quality Assurance Coordinator as a "Quality Issue". The Quality Assurance Coordinator must then document steps taken to resolve the "Quality Issue".

If there is a non-acceptable result in a performance evaluation sample, the Quality Assurance Coordinator works with the analysts and supervisors to discover the cause, and documents the failure as a "Quality Issue". If required, the Quality Assurance Coordinator prepares a corrective action report for accrediting agencies.

If there are findings from an internal audit, the Laboratory Director and supervisors prepare a corrective action plan. The Quality Assurance Coordinator evaluates the corrective action and then verifies that it has been successfully implemented.

## 5.9 Standard Operating Procedures

It is the policy of SVL to create and maintain standard operating procedures (SOPs) that are useful, accurate, current, and accessible to all employees at SVL. To this end, SVL endeavors to incorporate the input of analysts, staff and/or those most closely involved with the tasks outlined in the SOPs.

To obtain reliable results and ensure reproducibility, SVL generates, distributes and uses accurate and effective SOPs. The appropriate supervisor or director reviews each SOP draft for technical accuracy. The Quality Assurance Coordinator reviews SOPs to ensure that they are in compliance with the appropriate published method, any other applicable regulations, and that they conform to SVL's QA program. In the event that a draft SOP fails to meet any of these requirements, it is denied approval by the QA office, returned to the appropriate personnel for modification.

The numbering system for SOPs is comprised of seven characters: the letters SVL followed by a four digit, unique number in the following categories:

- 1000 series - Quality Assurance and Safety
- 2000 series - Sample and Data Management
- 3000 series - Organic Procedures
- 4000 series - Inorganic Procedures
- 6000 series - Mineral Division Procedures

As new procedures are generated, the QA office determines the appropriate category and assigns the next consecutive number for that category.

## 6. DATA MANAGEMENT

*SVL utilizes state of the art networking software*

SVL utilizes state of the art networking software (Novell NetWare® 3.11™ & 4.11™) and hardware to integrate laboratory operations from sample receiving to report generation. Automation and connectivity enables SVL to rapidly process and manage large amounts of data. Network linked PCs are located in analytical laboratories to enable personnel to review data on individual jobs and samples, methods, and SOPs.

Analysts perform specific analyses and enter data onto benchsheets or directly into the computer system depending on the type of report desired by the client. After a set of analyses has been completed, the results are calculated according to the methods specified in the standard operating procedures. The supervisor or director reviews at least 70% of the data and quality control.

Data that will be used to create an USEPA CLP deliverables package is then loaded into a Ward Scientific software program for CLP report generation. After assembly, Contract Compliance Screening software is utilized to screen data packages for completeness and accuracy before delivery to the client. SVL has the capability of providing hardcopy and diskettes. IBM compatible diskettes are available in all EPA CLP formats, as well as popular spreadsheet and database files.

Data that will be assembled into a standard report are loaded into SVL's proprietary Sample Management system. Reports are available in a number of routine and custom hardcopy formats. ASCII, spreadsheet, and database data files are also available. If a client has a specific format, we are usually able to provide data that will merge into their previous records without problems.

All data related to each job are archived for at least 12 months after reports have been issued. This period may be longer or shorter, at the clients discretion.

## 7. CERTIFICATIONS

*SVL maintains current accreditation with several western states*

### 7.1 Drinking Water Accreditations

- Idaho
- Texas
- Montana
- Nevada
- Washington
- California
- Colorado
- Arizona

### 7.2 Environmental Accreditations

- Nevada
- Washington
- California
- Arizona

*Refer to supporting documents section for copies of certificates.*

## 8. GLOSSARY

*Below you will find a list of terms used in this manual and their intended definition*

**Accuracy** The degree of agreement of a measured value with the true or expected value of the quantity of concern.

**Aliquot** An exact fraction of a solution or suspension.

**Bias** A systematic error inherent in a method or caused by some artifact or idiosyncrasy of the measurement system. Temperature effects and extraction efficiencies are examples of the first kind. Blanks, contamination, mechanical losses, and calibration errors are examples of the latter kinds. Bias may be both positive and negative, and several kinds can exist concurrently so that net bias is all that can be evaluated, except under special conditions.

**Blank** An artificial sample designed to monitor the introduction of artifacts into the process. For aqueous samples, reagent water is used as a blank matrix; however, a universal blank matrix does not exist for solid samples, and therefore, no matrix is used.

**Reagent Blank** Aliquot of analyte-free water or solvent analyzed with the analytical batch. Prep Blanks are reagent blanks which are created at the time of sample preparation using all the reagents used in the preparation of the samples (i.e., digestion, distillation or extraction)

**Method Blank** Reagent blank which are put through all the steps of a specific method along with the samples.

**Field Blank** Randomly selected sample container that is filled with distilled water and the appropriate chemical preservative in the field.

**Trip Blank** A specific type of field blank. A trip blank is not opened in the field. It is a check on sample contamination originating from sample transport, shipping, and site conditions.

**Blind Sample** A sample submitted for analysis whose composition is known to the submitter but unknown to the analyst. A blind sample is one way to test proficiency of a measurement process.

**Calibration** Comparison of a measurement standard or instrument with another standard or instrument to report or eliminate by adjustment any variation (deviation) in the accuracy of the item being compared.

**Check Standard** A blank which has been spiked with the analyte(s) from an independent source in order to monitor the execution of the analytical method.

**Contamination** There are two general classifications of contamination; random and systematic. Random contamination causes imprecision in analytical results as noted by significant differences between results of duplicate analyses. Systematic contamination generally results in consistent shifts in baseline concentrations as demonstrated by field, trip or equipment blanks.

**CLP** The Contract Laboratory Program (CLP) created by the United States Environmental Protection Agency to perform analytical work required in support of Superfund.

**SVL ANALYTICAL, INC.**

**Control Limits** The limits shown on a control chart beyond which it is highly improbable (within a 99.7 % probability) that a point could lie while the system remains in a state of statistical control.

**Control Chart** A graphical plot of test results with respect to time or sequence of measurement, together with limits within which they are expected to lie when the system is in a state of statistical control.

**Detection Limit** The smallest concentration/amount of some component of interest that can be measured by a single measurement with a stated level of confidence.

**Double Blind** A sample known by the submitter but submitted to an analyst in such a way that neither its composition nor its identification as a check sample are known to the latter.

**Duplicate Samples** Aliquot taken in the laboratory of the same sample, treated exactly the same throughout the analytical method. The relative percent difference (RPD) between the values of the duplicates, as calculated below, is taken as a measure of the precision of the analytical method. The relative percent difference for original sample and duplicate is calculated as follows:

$$RPD = \left[ \frac{|S - D|}{\frac{(S + D)}{2}} \right] \times 100$$

where

RPD=Relative Percent Difference

S=First Sample Value (original)

D=Second Sample Value (duplicate)

**Homogeneity** The degree to which a property or substance is randomly distributed throughout a material. Homogeneity depends on the size of the sample under consideration. Thus a mixture of two minerals may be nonhomogeneous at the molecular or atomic level but homogeneous at the particulate level.

**Instrument Detection Limit (IDL)** The smallest concentration detectable on a specific instrument.

**Laboratory Control Sample** A material of known composition that is analyzed concurrently with test samples to evaluate a measurement process.

**Matrix Spike** A sample to which a known amount of analyte(s) has been added. Designed to provide information about the effect of the sample matrix on the digestion and measurement methodology. The spike is added prior to sample extraction/digestion and analysis. Individual component sample recoveries are calculated as follows:

$$\% \text{Recovery} = \left[ \frac{(SSR - SR)}{SA} \right] \times 100$$

where

SSR = Spiked Sample Result

SR = Sample Result

SA = Spike Added

**Mean** The sum of all observations divided by the number of observations.

**Method** An assemblage of measurement techniques and the order in which they are used.

**Method Detection Limit (MDL)** The smallest concentration detectable by a specific method (the standards used for this determination are carried through all the steps required by the method).

**Performance Audit** A process to evaluate the proficiency of an analyst or laboratory by evaluation of the results obtained on known test materials.

**SVL ANALYTICAL, INC.**

**Precision** The degree of mutual agreement characteristic of independent measurements as the results of repeated application of the process under specified conditions.

**Procedure** A set of systematic instructions for using a method of measurement or sampling or the steps or operations associated with them.

**Quality Assurance** A system of activities which the purpose is to provide to the producer or user of a service the assurance that it meets defined standards of quality.

**Quality Control** The overall system of activities whose purpose is to control the quality of a service so that it meets the needs of users.

**Relative Standard Deviation** The standard deviation divided by the mean and multiplied by 100.

$$RSD = \left[ \frac{s}{x} \right] \times 100$$

**Sample** A representative sample of any material (aqueous, nonaqueous, or multimedia) collected from any source for which determination of composition or contamination is requested or required.

**Standard Operating Procedure** A procedure adopted for repetitive use when performing a specific measurement or sampling operation. It may be a standard method or one developed by the user.

**Subsample** A portion taken from a sample. A laboratory sample may be a subsample of a gross sample; similarly, a test portion may be a subsample of a laboratory sample.

**Standard Deviation** The positive square root of the variance (i.e.,  $\sigma$  for populations and  $s$  for a sample set of the population). A measure of the average spread around the mean.

**Variance** The value approached by the average of the sum of the squares of deviations of individual measurements from the mean. Mathematically, it may be expressed as:

$$\frac{\sum (X_i - m)^2}{n} \rightarrow \sigma^2 \text{ as } n \rightarrow \infty$$

Ordinarily, it cannot be known but only its estimate  $s^2$ , which is calculated by the expression:

$$s^2 = \frac{\sum (X_i - \bar{X})^2}{n - 1}$$

**Warning Limits** The limits on a control chart within which most of the test results are expected to lie (within a 95% probability) while the system remains in a state of statistical control.



**APPENDIX**

*Supporting documents*

## SVL ACCREDITATIONS

	Nevada	Colorado	Arizona	Idaho	Montana	Texas	California	Washington
<b>DRINKING WATER PARAMETERS</b>								
Aluminum	X		X					
Antimony	X	X	X	X	X	X	X	X
Arsenic	X	X	X	X	X	X	X	X
Barium	X	X	X	X	X	X	X	X
Beryllium	X	X	X	X	X	X	X	X
Cadmium	X	X	X	X	X	X	X	X
Calcium	X		X				X	
Chromium	X	X	X	X	X	X	X	X
Copper	X	X	X	X	X	X	X	X
Iron	X		X				X	
Lead	X	X	X	X	X	X	X	X
Magnesium	X		X				X	
Manganese	X		X				X	
Mercury	X	X	X	X	X	X	X	X
Nickel	X	X	X	X	X	X	X	X
Potassium	X						X	
Selenium	X	X	X	X	X	X	X	X
Silver	X		X				X	
Sodium	X	X	X	X	X		X	X
Thallium	X	X	X	X	X	X	X	X
Zinc	X		X				X	
Alkalinity	X		X				X	
Cyanide	X	X	X	X	X	X	X	X
Nitrate	X	X	X	X	X	X	X	X
Nitrite	X	X	X	X	X	X	X	X
Nitrate + Nitrite	X							
Turbidity	X		X					
pH	X		X					
Chloride	X		X				X	
Fluoride	X	X	X	X	X	X	X	X
Sulfate	X		X				X	
TDS or Filterable Residue	X		X				X	
Conductivity	X		X				X	
ortho-Phosphate	X						X	

### SVL ACCREDITATIONS

	Nevada	Colorado	Arizona	Idaho	Montana	Texas	California	Washington
DRINKING WATER PARAMETERS (continued)								
Hardness	X		X				X	
Silica			X				X	
Trihalomethanes	X		X	X	X	X		X
524.2 Volatile Organic Compounds by GC/MS	X	X	X	X	X	X	X	X
504.1 EDB DBCP				X	X		X	X









## SVL ACCREDITATIONS

	Nevada	Colorado	Arizona	Idaho	Montana	Texas	California	Washington
<b>RCRA PARAMETERS</b>								
Aluminum			X					
Antimony			X				X	X
Arsenic			X				X	X
Barium			X				X	X
Beryllium			X				X	X
Cadmium			X				X	X
Calcium			X					
Chromium			X				X	X
Cobalt			X				X	X
Copper			X				X	X
Iron			X					
Lead			X				X	X
Lithium			X					
Magnesium			X					
Manganese			X					
Mercury			X				X	X
Molybdenum			X				X	X
Nickel			X				X	X
Potassium			X					
Selenium			X				X	X
Silver			X				X	X
Sodium			X					
Strontium			X					
Thallium			X				X	X
Tin			X					
Vanadium			X				X	X
Zinc			X				X	X
Fluoride							X	
Cyanide			X				X	X
TCLP			X				X	
Cation Exchange Capacity			X					
SPLP			X					
Ignitability			X					
pH			X					

## SVL ACCREDITATIONS

	Nevada	Colorado	Arizona	Idaho	Montana	Texas	California	Washington
RCRA PARAMETERS (continued)								
8011 EDB DBCP			X				X	
8021B Volatile Organic Compounds by GC								
8081A Organochlorine Pesticides			X				X	X
8082 PCBs								X
8260B Volatile Organic Compounds by GCMS			X					X
8270C Semivolatile Organic Compounds by GCMS			X					X



# ENVIRONMENTAL LABORATORY LICENSE

Issued to:

Laboratory Director: J. BLAKE JOHNSON  
Owner/Representative: WAYNE SORENSEN

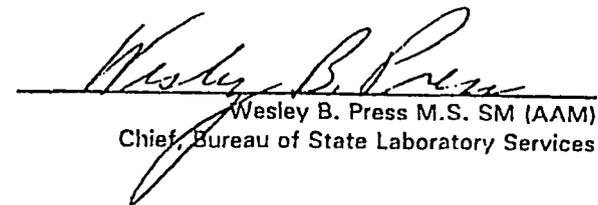
***SVL ANALYTICAL, INC.***

***AZ0538***

is in compliance with Environmental Laboratory's applicable standards for the State of Arizona and maintains on file a List of Parameters for which the laboratory is certified to perform analysis.

PERIOD OF LICENSURE FROM: 04/22/2001 TO 04/22/2002



  
Wesley B. Press M.S. SM (AAM)  
Chief, Bureau of State Laboratory Services

STATE OF CALIFORNIA  
DEPARTMENT OF HEALTH SERVICES

**ENVIRONMENTAL LABORATORY CERTIFICATION**

is hereby granted to

**SVL ANALYTICAL, INC.**

ONE GOVERNMENT GULCH  
KELLOGG, IDAHO

to conduct analyses of environmental samples as specified in the  
"List of Approved Fields of Testing and Analytes"  
which accompanies this Certificate.

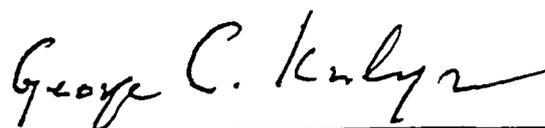
This Certificate is granted in accordance with provisions of Section 1010, et seq.  
(New Section 100825) of the Health and Safety Code.

Certificate No.: 2080

Expiration Date: 08/31/2003

Issued on: 08/01/2001

at Berkeley, California,  
subject to forfeiture or revocation.



George C. Kulasingam, Ph.D.  
Manager  
Environmental Laboratory Accreditation Program

**CALIFORNIA DEPARTMENT OF HEALTH SERVICES**  
**ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM**  
List of Approved Fields of Testing and Analytes

SVL ANALYTICAL, INC.  
ONE GOVERNMENT GULCH  
KELLOGG, ID

PHONE No. (208) 784-1258      Certificate No. 2080  
Expiration Date 08/31/2001

**02      Inorganic Chemistry and Physical Properties of Drinking Water**

02.01      Alkalinity  
02.02      Calcium  
02.03      Chloride  
02.04      Corrosivity  
02.05      Fluoride  
02.06      Hardness  
02.07      Magnesium  
02.09      Nitrate  
02.10      Nitrite  
02.11      Sodium  
02.12      Sulfate  
02.13A      Total Dissolved Solids  
02.13B      Conductivity  
02.17      Silica  
02.18      Cyanide  
02.19      Potassium

**03      Analysis of Toxic Chemical Elements in Drinking Water**

03.01      Arsenic  
03.02      Barium  
03.03      Cadmium  
03.04      Chromium, total  
03.05      Copper  
03.06      Iron  
03.07      Lead  
03.08      Manganese  
03.09      Mercury  
03.10      Selenium  
03.11      Silver  
03.12      Zinc  
03.13      Aluminum  
03.15      Antimony  
03.16      Beryllium  
03.17      Nickel  
03.18      Thallium

**04      Organic Chemistry of Drinking Water by GC/MS**

04.02A      EPA Method 524.2 Regulated Volatiles  
04.02B      EPA Method 524.2 Unregulated Volatiles  
04.02C      EPA Method 524.2 Vinyl Chloride  
04.02D      EPA Method 524.2 Trihalomethanes

**05      Organic Chemistry of Drinking Water (excluding GC/MS)**

05.06      EPA Method 504.1 EDB, DBCP

10 Inorganic Chemistry and Toxic Chemical Elements of Hazardous Waste

- 10.01 Antimony
- 10.02 Arsenic
- 10.03 Barium
- 10.04 Beryllium
- 10.05 Cadmium
- 10.06 Chromium, total
- 10.07 Cobalt
- 10.08 Copper
- 10.09 Lead
- 10.10 Mercury
- 10.11 Molybdenum
- 10.12 Nickel
- 10.13 Selenium
- 10.14 Silver
- 10.15 Thallium
- 10.16 Vanadium
- 10.17 Zinc
- 10.18 Chromium (VI)
- 10.19 Cyanide
- 10.20 Fluoride

11 Extraction Tests of Hazardous Waste

- 11.03 Toxicity Characteristic Leaching Procedure (TCLP) All Classes

13 Organic Chemistry of Hazardous Waste (excluding GC/MS)

- 13.15 Total Petroleum Hydrocarbons - Gasoline (LUFT)
- 13.16 Total Petroleum Hydrocarbons - Diesel (LUFT)
- 13.17 EPA Method 418.1 TRPH - Screening by IR
- 13.18 EPA Method 8011 EDB and DBCP
- 13.25C EPA Method 8081A Organochlorine Pesticides only

16 Wastewater Inorganic Chemistry, Nutrients and Demand

- 16.01 Acidity
- 16.02 Alkalinity
- 16.03 Ammonia
- 16.05 Boron
- 16.07 Calcium
- 16.09 Chemical Oxygen Demand
- 16.10 Chloride
- 16.12 Cyanide
- 16.14 Fluoride
- 16.15 Hardness
- 16.16 Kjeldahl Nitrogen
- 16.17 Magnesium
- 16.18 Nitrate
- 16.19 Nitrite
- 16.20 Oil and Grease
- 16.21 Organic Carbon
- 16.23 pH
- 16.24 Phenols

Certificate No. 2080  
Expiration Date 08/31/2001

- 16.25 Phosphate, ortho
- 16.26 Phosphorus, total
- 16.27 Potassium
- 16.28 Residue, Total
- 16.29 Residue, Filterable (Total Dissolved Solids)
- 16.30 Residue, Nonfilterable (Total Suspended Solids)
- 16.34 Sodium
- 16.35 Specific Conductance
- 16.36 Sulfate
- 16.37 Sulfide (includes total & soluble)
- 16.41 Turbidity
- 16.45 Total Organic Halides
- 17 **Toxic Chemical Elements in Wastewater**
  - 17.01 Aluminum
  - 17.02 Antimony
  - 17.03 Arsenic
  - 17.04 Barium
  - 17.05 Beryllium
  - 17.06 Cadmium
  - 17.07 Chromium (VI)
  - 17.08 Chromium, total
  - 17.09 Cobalt
  - 17.10 Copper
  - 17.11 Gold
  - 17.13 Iron
  - 17.14 Lead
  - 17.15 Manganese
  - 17.16 Mercury
  - 17.17 Molybdenum
  - 17.18 Nickel
  - 17.24 Selenium
  - 17.25 Silver
  - 17.27 Thallium
  - 17.28 Tin
  - 17.29 Titanium
  - 17.30 Vanadium
  - 17.31 Zinc
- 18 **Organic Chemistry of Wastewater by GC/MS**
  - 18.01A-1 EPA Method 624 Halogenated Hydrocarbons
  - 18.01B-1 EPA Method 624 Aromatic Compounds
  - 18.01D-1 EPA Method 624 Other Volatile Organics
- 19 **Organic Chemistry of Wastewater (excluding GC/MS)**
  - 19.01-1 EPA Method 601 Halogenated Volatiles
  - 19.02-1 EPA Method 602 Aromatic Volatiles
  - 19.08A-1 EPA Method 608 Organochlorine Pesticides only
  - 19.08B-1 EPA Method 608 PCBs only

**Colorado Department of Public Health and Environment**  
under Primacy Agreement with the  
United States Environmental Protection Agency  
Pursuant to the Safe Drinking Water Regulations, 40CFR, Part 141

Certifies

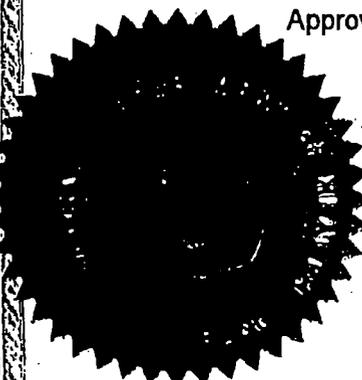
**SVL ANALYTICAL, INC.**  
**One Government Gulch**  
**Kellogg, Idaho 83837**

is in compliance with the criteria and procedures of the EPA, Manual for the Certification of Laboratories Analyzing Drinking Water.  
The laboratory may perform **Chemistry Analysis** on public drinking water for the following analyte groups:

Trace Metals(TM1, TM2), Nitrate, Nitrite, Fluoride, THM, VOC(V1, V2), Cyanide

Approved analytes and methods are specified on certification list of September 1, 2001

**EFFECTIVE: September 1, 2001 through August 31, 2002**



*David A. Butcher*

David A. Butcher, Director  
Laboratory and Radiation Services Division

**CERTIFICATION STATUS (CHEMISTRY) SAFE DRINKING WATER ACT**

Name: SVL Analytical, Inc.  
 PO Box 929 - One Government Gulch  
 Kellogg, Idaho 83837

Date: September 1, 2001

<u>TRACE METALS</u>	<u>METHOD</u>	<u>CARBAMATES/VYDATE</u>	<u>METHOD</u>
<u>TM1</u>		<u>C/V</u>	
(A)Arsenic	EPA200.9	(N)Carbofuran	
(A)Barium	EPA200.7	(N)Oxamyl(Vydate)	
(A)Cadmium	EPA200.7		
(A)Chromium	EPA200.7		
(A)Lead	EPA200.9		
(A)Mercury	EPA245.1		
(A)Selenium	EPA200.9		
<u>TM2</u>		<u>HERBICIDES</u>	
(A)Antimony	EPA200.9	<u>H1</u>	
(A)Beryllium	EPA200.7	(N)2,4-D	
(A)Copper	EPA200.7	(N)2,4,5-TP	
(A)Nickel	EPA200.7		
(A)Thallium	EPA200.9	<u>H2</u>	
		(N)Dalapon	
		(N)Dinoseb	
		(N)Pentachlorophenol	
		(N)Picloram	
<u>NITRATE/NITRITE/FLUORIDE</u>		<u>PCB</u>	
<u>N/N/F</u>		(N)Decachlorobiphenyl	
(A)Nitrate-N	EPA300.0		
(A)Nitrite-N	EPA300.0		
(A)Fluoride-F	EPA300.0	<u>PAH</u>	
		(N)Benzo(a)pyrene	
<u>PESTICIDES</u>		<u>ADIPATES/PHTHALATES</u>	
<u>P1</u>		<u>A/P</u>	
(N)Endrin		(N)Bis-(2-ethylhexyl) Adipate	
(N)Lindane		(N)Bis-(2-ethylhexyl) Phthalate	
(N)Methoxychlor			
(N)Toxaphene			
<u>P2</u>			
(N)Alachlor			
(N)Atrazine			
(N)Chlordane			
(N)Heptachlor			
(N)Heptachlor Epoxide			
(N)Hexachlorobenzene			
(N)Hexachloro-			
cyclopentadiene			
(N)Simazine			

(A) = Approved / Certified  
 (N) = Not Certified  
 (P) = Provisionally Certified  
 (I) = Interim Certified

Name: SVL Analytical, Inc.  
PO Box 929 - One Government Gulch  
Kellogg, Idaho 83837

Date: September 1, 2001

<u>THM</u>	<u>METHOD</u>	<u>MISCELLANEOUS</u>	<u>METHOD</u>
(A)Bromodichloromethane	EPA524.2	(N)Diquat	
(A)Bromoform	EPA524.2	(N)Endothall	
(A)Chlorodibromomethane	EPA524.2	(N)Glyphosate	
(A)Chloroform	EPA524.2	(N)Asbestos	
	EPA524.2	(N)Dioxin	
		(A)Cyanide	EPA335.4

REGULATED VOC

V1

(A)Benzene	EPA524.2
(A)Carbon Tetrachloride	EPA524.2
(A)1,2-Dichlorobenzene	EPA524.2
(A)1,2-Dichloroethane	EPA524.2
(A)1,1-Dichloroethylene	EPA524.2
(A)Trichloroethylene	EPA524.2
(A)Vinyl Chloride	EPA524.2

V2

(A)Chlorobenzene	EPA524.2
(A)1,4-Dichlorobenzene	EPA524.2
(A)c-1,2-Dichloroethylene	EPA524.2
(A)t-1,2-Dichloroethylene	EPA524.2
(A)1,2-Dichloropropane	EPA524.2
(A)Ethylbenzene	EPA524.2
(A)Styrene	EPA524.2
(A)Tetrachloroethylene	EPA524.2
(A)Toluene	EPA524.2
(A)1,1,1-Trichloroethane	EPA524.2
(A)Xylenes (Total)	EPA524.2
(A)Dichloromethane	EPA524.2
(A)1,2,4-Trichlorobenzene	EPA524.2
(A)1,1,2-Trichloroethane	EPA524.2

v3

(N)1,2-Dibromo3-chloropropane
(N)Ethylene Dibromide

(A) = Approved / Certified  
(N) = Not Certified  
(P) = Provisionally Certified  
(I) = Interim Certified



# STATE OF IDAHO

DEPARTMENT OF HEALTH AND WELFARE

## WATER QUALITY LABORATORY CERTIFICATION

For  
July 1, 2001 through June 30, 2002

Year  
SVL Analytical

Laboratory  
One Government Gulch

Address  
Kellogg, ID 83837

CITY/STATE

This is to certify that the above named laboratory has met the requirements provided in Chapter 1, Title 39 of the Idaho Code [101, 102, 103, and 105] and the rules and regulations governing certification of Idaho Water Quality Laboratories as approved by the Idaho State Board of Health and Welfare. This certification applies to testing of public drinking water for the following parameters:

Water Chemistry – See Attached list of Parameters and Methods

*Richard F. Hudson*  
Chief, Bureau of Laboratories



State of Idaho  
**DEPARTMENT OF HEALTH AND WELFARE**  
 Division of Health

Bureau of Laboratories

2220 Old Penitentiary Rd.  
 Boise, Idaho 83712  
 (208) 334-2235

DIRK KEMPTHORNE  
 Governor

KARL B. KURTZ  
 Director

RICHARD H. SCHULTZ  
 Administrator

**DRINKING WATER LABORATORY CERTIFICATION**

SVL Analytical Laboratories, Inc.  
 One Government Gulch  
 Kellogg, Id 83837-0929

Issued: September 5, 2001  
 Expiration: June 30, 2002  
 (or until revised)

<u>List of Analytes</u>	<u>Status</u> <sup>1</sup>	<u>Methods</u>
<u>Inorganic Chemicals</u>		
Antimony	C	200.9
Arsenic	C	200.9
Barium	C	200.7
Beryllium	C	200.7
Cadmium	C	200.7
Chromium	C	200.7
Copper	C	200.7
Lead	C	200.9
Mercury	C	245.1
Nickel	C	200.7
Selenium	C	200.9
Sodium	C	200.7
Thallium	C	200.9
Cyanide	C	335.4
Fluoride	C	300.0
Nitrate	C	300.0, 353.2
Nitrite	C	300.0
<u>Volatile Organic Chemicals</u>		
Dibromochloropropane (DBCP)	*	
Ethylene Dibromide (EDB)	*	
Total Trihalomethanes (TTHM's)	C	524.2
VOC's (Except Vinyl Chloride)	C	524.2
Vinyl Chloride	C	524.2
<u>Synthetic Organic Chemicals</u>		
<u>Pesticides</u>		
Alachlor	*	
Atrazine	*	
Chlordane	*	
Endrin	*	
Lindane	*	
Heptachlor	*	
Heptachlor Epoxide	*	
Hexachlorobenzene	*	
Hexachlorocyclopentadiene	*	
Methoxychlor	*	
Simazine	*	
Toxaphene	*	
<u>Herbicides</u>		
2,4-D	*	
2,4,5-TP (Silvex)	*	
Dalapon	*	
Dinoseb	*	
Pentachlorophenol	*	
Picloram	*	
<u>Carbamates</u>		
Carbofuran	*	
Oxamyl (Vydate)	*	
<u>Miscellaneous</u>		
Adipates	*	
Phthalates	*	
Polynuclear Aromatic Hydrocarbons	*	
Polychlorinated Biphenyl's (PCB's)	*	
Diquat	*	
Endothall	*	
Glyphosate	*	

1) C = Certified, N = Not Certified, P = Provisionally Certified, \* = Certification Not Requested



MONTANA DEPARTMENT OF  
PUBLIC HEALTH AND HUMAN SERVICES  
ENVIRONMENTAL LABORATORY

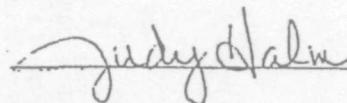
Recognizes that

**SVL ANALYTICAL**

has completed the requirements for Montana certification and is licensed to analyze Montana's Public Drinking Water Supplies. See attached listing.

Montana Certification Number: CERT0027

Expiration Date: 6/30/2001



Judy Halm  
Laboratory Certification Officer  
DPHHS Environmental Laboratory

**STATE OF NEVADA HEALTH DIVISION  
BUREAU OF LICENSURE AND CERTIFICATION**

**ENVIRONMENTAL LABORATORY SERVICES  
LABORATORY CERTIFICATION PROGRAM**

The environmental laboratory listed on this Certificate has met the quality requirements as specified by the Nevada Administrative Code 445A and is hereby certified to conduct the analyses of water for the contaminants listed on their accepted parameter list(s) effective dates:

**July 1, 2001 through July 31, 2002**

**SVL Analytical Laboratory  
One Government Gulch Road  
Kellogg, Idaho 83837**



**CERTIFICATE No. ID-19-2002-35**

Jack Ruckman  
Jack Ruckman Ph.D.  
Laboratory Certification Officer

8/1/01  
Date

Don LaFara  
Donald E. LaFara  
Laboratory Certification Officer

8-1-01  
Date

KENNY C. GUINN  
Governor

MICHAEL J. WILLDEN  
Director



YVONNE SYLVA  
Administrator

State Health Officer

STATE OF NEVADA  
DEPARTMENT OF HUMAN RESOURCES  
**HEALTH DIVISION**  
BUREAU OF LICENSURE AND CERTIFICATION

Health Facilities/Lab Services  
1550 E. College Parkway  
Suite 158  
Carson City, Nevada 89706  
(775) 687-4475  
Fax: (775) 687-6588

Health Facilities/Lab Services  
4220 S. Maryland Parkway  
Suite 810, Building D  
Las Vegas, Nevada 89119  
(702) 486-6515  
Fax: (702) 486-6520

Health Facilities/Lab Services  
1755 E. Plumb Lane  
Suite 241  
Reno, Nevada 89502  
(775) 688-2888  
Fax: (775) 688-2898

Emergency Medical Services  
1550 E. College Parkway  
Suite 158  
Carson City, Nevada 89706  
(775) 687-4475  
Fax: (775) 687-6588

Emergency Medical Services  
850 Elm Street  
Elko, Nevada 89801  
(775) 753-1154  
Fax: (775) 753-4112

Emergency Medical Services  
P.O. Box 1227  
Tonopah, Nevada 89049  
(775) 482-3722  
Fax: (775) 482-6975

Emergency Medical Services  
1755 E. Plumb Lane  
Suite 241  
Reno, Nevada 89502  
(775) 688-2888  
Fax: (775) 688-2898

April 22, 2002

**Certified Parameter List**  
**SDWA-CHEMISTRY**

PAUL DUERKSON  
SVL ANALYTICAL LABS, INC  
ONE GOVERNMENT GULCH  
KELLOGG ID 83837

Pursuant to regulations adopted by the State Board of Health, the State of Nevada will accept data from this laboratory for the following contaminants under the Safe Drinking Water Act. Please be advised that it is the responsibility of the laboratory to make your clientele aware of these changes. In particular it is important that the clients are aware of the loss of any previously certified parameters. If the laboratory subcontracts samples to other laboratories, it is the responsibility of the laboratory to ensure that the contracting laboratory is Nevada certified for all contracted parameters. The clients must be made aware of any subcontracted work. Your 1<sup>st</sup> quarter (2002) proficiency testing results should be submitted prior to the expiration date listed below.

**This certification is effective until July 31, 2002.**

**Primary Inorganic Contaminants**

**Secondary Inorganic Contaminants**

Antimony 200.9  
Arsenic 200.7, 200.9  
Alkalinity 2320-B  
Barium 200.7  
Beryllium 200.7  
Cadmium 200.7, 200.9  
Chromium 200.7  
Cyanide 335.4, 1667  
Fluoride 300.0, 340.2  
Mercury 245.1  
Nickel 200.7  
Nitrate 300.0, 353.2  
pH 150.1  
Nitrite 300.0, 353.2  
Total Nitrate/Nitrite  
Selenium 200.9  
Thallium 200.9  
Lead 200.9  
Copper 200.7  
Turbidity 2130-B

Boron 200.7  
Manganese 200.7  
Iron 200.7  
Sodium 200.7  
Calcium 200.7  
Magnesium 200.7  
Conductivity 2510-B  
Molybdenum 200.7  
Zinc 200.7  
T. Phosphorus 365.2  
Chloride 300.0  
Sulfate 300.0  
Silver 200.7  
Aluminum 200.7  
Ca-Hardness 200.7  
T. Hardness 200.7  
Potassium 200.7  
TDS 2540-C  
Color 2120-B  
Vanadium 200.7

Page 1 of 2

Building and Strengthening Public Health through Communication and Partnerships

April 22, 2002

**STATE OF NEVADA**  
**Certified Parameter List**  
**SDWA-CHEMISTRY**

PAUL DUERKSON  
SVL ANALYTICAL LABS, INC  
ONE GOVERNMENT GULCH  
KELLOGG ID 83837

**Organics**

Trihalomethanes	524.2
Regulated VOCs	524.2
Unregulated VOCs	524.2
Vinyl Chloride	524.2

**Summary of Changes: None**

-----END OF REPORT-----

*Don LaFara*

Donald E. LaFara  
Laboratory Certification Officer  
Nevada State Health Division

*4-22-02*

Approved

(775) 687-4670  
 TDD 687-4678

Administration  
 Facsimile 687-5856

Water Pollution Control  
 Facsimile 687-4684

Mining Regulation and  
 Reclamation  
 Facsimile 684-5259



Waste Management  
 Corrective Actions  
 Federal Facilities  
 Air Pollution Control  
 Air Quality Planning  
 Water Quality Planning  
 Facsimile 687-6396

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES  
**DIVISION OF ENVIRONMENTAL PROTECTION**

333 W. Nye Lane, Room 138  
 Carson City, Nevada 89706

Accepted Parameter List  
CHEMISTRY

June 21, 2002

PAUL DUERKSEN  
 SVL ANALYTICAL LABS, INC  
 ONE GOVERNMENT GULCH  
 KELLOGG ID 83837

Pursuant to regulations adopted by the State Environmental Commission, the State of Nevada will accept data from this laboratory for the following contaminants under the Clean Water Act. Please be advised that it is the responsibility of the laboratory to make your clientele aware of changes. In particular it is important that the clients are aware of the loss of any previously certified parameters. If the laboratory subcontracts samples to other laboratories, it is the responsibility of the laboratory to ensure that the contracting laboratory is Nevada certified for all contracted parameters. The clients must be made aware of any subcontracted work. This certification is effective until July 31, 2002.

<u>Metals</u>	<u>Methods</u>	<u>Minerals</u>	<u>Methods</u>
Aluminum	200.7	pH	150.1
Antimony	200.7, 204.2	Conductivity	120.1
Arsenic	200.7, 206.2	TDS @ 180°	160.1
Barium	200.7	Alkalinity	2320 B
Beryllium	200.7	Calcium	200.7
Boron	200.7	Magnesium	200.7
Cadmium	200.7, 213.2	Potassium	200.7
Chromium	200.7	Sodium	200.7
Mercury	245.1	Chloride	300.0
Cobalt	200.7	Fluoride	340.2, 300.0
Iron	200.7	Sulfate	300.0
Lead	200.7, 239.2	Acidity	2310 B
Manganese	200.7	Total Hardness	200.7
Zinc	200.7	Calcium Hardness	200.7
Strontium	200.7	Total Phosphorous	365.2
Thallium	200.7, 279.2	Kjeldahl Nitrogen	351.4
Titanium	200.7	ortho-phosphate	365.2
Vanadium	200.7	<u>BNAs</u>	625
Molybdenum	200.7		
Nickel	200.7	<u>Demands</u>	
Selenium	200.7, 270.2	COD	410.4
Silver	200.7	BOD	5210-B
Tin	200.7		
Copper	200.7		

**STATE OF NEVADA  
CERTIFIED PARAMETER LIST  
CHEMISTRY**

PAUL DUERKSEN  
SVL ANALYTICAL LABS, INC  
ONE GOVERNMENT GULCH  
KELLOGG ID 83837  
June 21, 2002

<u>Volatile Aromatics</u>	<u>Methods</u>	<u>Miscellaneous</u>	<u>Methods</u>
Benzene	602, 624	Total Cyanide	335.2
Chlorobenzene	601, 624	Cyanide	1677
Ethylbenzene	602, 624	NFR (TSS)	160.2
Toluene	602, 624	Oil & Grease	1664
1,2 Dichlorobenzene	624	Total Phenolics	420.1
1,3 Dichlorobenzene	624	Total Solids	160.3
1,4 Dichlorobenzene	624		
Xylenes	602, 624	<u>PCB/Water/Oil</u>	608
		1016 1242	
		1221 1248	
		1232 1254	
		1260	
<u>Volatile Halocarbons</u>		<u>Pesticides</u>	608
Methylene Chloride	601, 624	Aldrin	
1,1-Dichloroethane	601, 624	Chlordane	
Carbon Tetrachloride	624	DDT	
Dibromochloromethane	601, 624	Dieldrin	
1,2 Dichloroethane	601, 624	DDE	
Trichloroethene	624	DDD	
1,1,1 Trichloroethane	624	Endrin	
Chloroform	601, 624	Heptachlor	
Tetrachloroethene	601, 624	Heptachlor Epoxide	
Bromoform	601, 624	Methoxychlor	
Bromodichloromethane	601, 624		

Summary of Parameter List Changes

Add: BOD, ortho-phosphate

-----END OF REPORT-----

Recommended: June 21, 2002

Approved: June 21, 2002



Donald E. LaFara  
Laboratory Certification Officer  
Nevada State Health Division



Tom Porta P.E., Bureau Chief  
Water Quality Planning  
Division of Environmental Protection



# Texas Department of Health

William R. Archer III, M.D.  
Commissioner of Health

1100 West 49th Street  
Austin, Texas 78756-3199  
(512) 458-7111  
<http://www.tdh.state.tx.us>

Charles E. Bell, M. D.  
Executive Deputy Commissioner

## SCOPE OF CERTIFICATION TX241-2000A

**SVL Analytical, Inc.**  
One Government Gulch  
P.O. Box 929  
Kellogg, ID 83837  
(208) 784-1258  
Lab ID Number: TX241

### Drinking Water Laboratory Certification

Chemistry Categories

Effective Date: July 31, 2000

Expiration Date: July 31, 2002

Page 1 of 1

#### *Routine Inorganics*

Fluoride EPA 300.0, SM 4500-F-C  
Cyanide EPA 335.4

#### *Nitrate and Nitrite*

Nitrate-N EPA 300.0, EPA 353.2  
Nitrite-N EPA 300.0, EPA 353.2

#### *Metals*

Antimony EPA 200.9  
Arsenic EPA 200.9  
Barium EPA 200.7  
Beryllium EPA 200.7  
Cadmium\* EPA 200.7\*  
Chromium EPA 200.7  
Mercury EPA 245.1  
Nickel EPA 200.7  
Selenium EPA 200.9  
Sodium EPA 200.7  
Thallium\* EPA 200.9\*

#### *Lead and Copper*

Copper EPA 200.7  
Lead EPA 200.9

Total Trihalomethanes EPA 524.2

#### *Volatile Organics*

Benzene EPA 524.2  
Carbon tetrachloride EPA 524.2  
Chlorobenzene EPA 524.2  
1,2-Dichlorobenzene EPA 524.2  
1,4-Dichlorobenzene EPA 524.2  
1,2-Dichloroethane EPA 524.2  
1,1-Dichloroethylene EPA 524.2  
cis-1,2-Dichloroethylene EPA 524.2  
trans-1,2-Dichloroethylene EPA 524.2  
Dichloromethane EPA 524.2  
1,2-Dichloropropane EPA 524.2  
Ethylbenzene EPA 524.2  
Styrene EPA 524.2  
Tetrachloroethylene EPA 524.2  
Toluene EPA 524.2  
1,1,1-Trichloroethane EPA 524.2  
1,1,2-Trichloroethane EPA 524.2  
Trichloroethylene EPA 524.2  
1,2,4-Trichlorobenzene EPA 524.2  
Vinyl chloride EPA 524.2  
Total Xylenes EPA 524.2

#### *EDB and DBCP*

1,2-Dibromo-3-chloropropane EPA 504.1  
Ethylene dibromide EPA 504.1

\*Certified for non-composite samples only.

Max Phillips  
Laboratory Certification Officer

This certificate is the property of the Department and must be surrendered within seven days if the laboratory is decertified in whole or in part or withdraws voluntarily from certification. Continued certification status is contingent on successful ongoing participation in the program. Customers are encouraged to verify the above certificate by contacting the Department.

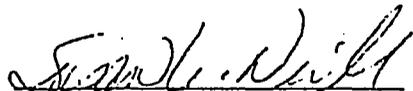
# The Texas Department of Health

This is to certify that

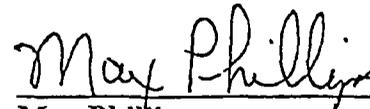
SVL Analytical, Inc. (TX241)  
One Government Gulch  
Kellogg, Idaho 83837

having complied with 25 TAC §73.24, Certification of Drinking Water, Milk, and Shellfish Laboratories, is hereby certified to conduct chemistry analysis of drinking water samples as specified in the attached cover letter and Scope of Certification.

Certificate Number: TX241-2000A  
Effective Date: July 31, 2000  
Expiration Date: July 31, 2002



Susan U. Neill  
Acting Chief, Bureau of Laboratories



Max Phillips  
Laboratory Certification Officer

This certificate and all attachments are the property of the Texas Department of Health and must be surrendered within seven days if the laboratory is decertified in whole or in part or withdraws voluntarily from certification. Continued certification status is contingent on successful ongoing participation in the program. Customers are encouraged to verify the above certificate by contacting the Texas Department of Health.

The State of  
Department



Washington  
of Ecology

This is to certify that

**SVL Analytical, Incorporated**  
**Kellogg, ID**

has complied with provisions set forth in Chapter 173-50 WAC and is hereby recognized by the Department of Ecology as an ACCREDITED LABORATORY for the analytical parameters listed on the accompanying Scope of Accreditation. This certificate is effective May 17, 2002, and shall expire May 16, 2003.

Witnessed under my hand on June 17, 2002.

Perry F. Brake, Chemist  
Lab Accreditation Unit Supervisor

Lab Accreditation Number  
C074

## Scope of Accreditation

### SVL Analytical, Incorporated

Kellogg, ID

is accredited by the State of Washington Department of Ecology to perform analyses for the parameters listed below using the analytical methods indicated. This Scope of Accreditation applies to non-potable water analyses only. Accreditation for all parameters is final unless indicated otherwise in a note. Accreditation is for the latest version of a method unless otherwise specified in a note. EPA refers to the U.S. Environmental Protection Agency. SM refers to American Public Health Association's publication, Standard Methods for the Examination of Water and Wastewater, 18th edition, unless otherwise noted. ASTM stands for the American Society of Testing and Materials. PSEP stands for Puget Sound Estuary Program. Other references are detailed in the notes section.

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Parameter Name	Reference	Method Number	Notes
Alkalinity, Total	SM	2320 B(4a)	
Ammonia	EPA	350.1	2
Ammonia	EPA	350.3	
Bromide	EPA	300.0	
Chemical Oxygen Demand (COD)	EPA	410.4(7.3)	
Chloride	EPA	300.0	
Color	EPA	110.2	
Cyanide, Available	EPA	OIA-1677	3
Cyanide, Total	EPA	335.2(8.7)	
Cyanide, Total	EPA	9012	
Fluoride	EPA	340.2	
Hexane Extractable Material	EPA	1664	2
Nitrate	EPA	300.0	
Nitrate	EPA	353.2	
Nitrate + Nitrite	EPA	300.0	
Nitrate + Nitrite	EPA	353.2	
Nitrite	EPA	300.0	
Nitrite	EPA	353.2	
Nitrogen, Total Kjeldahl	EPA	351.4	2
Orthophosphate	EPA	365.2	
pH	EPA	150.1	
Phenolics, Total Recoverable	EPA	420.1	
Phosphorus, Total	EPA	365.2	
Solids, Total Dissolved	EPA	160.1	
Solids, Total Suspended	EPA	160.2	

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Washington State Department of Ecology

Laboratory Accreditation Unit

Date Printed: 8/19/2002

Page 1 of 4

Scope of Accreditation Report for SVL Analytical, Incorporated

Scope Expires: 5/16/2003

Parameter Name	Reference	Method Number	Notes
Solids, Total Volatile	EPA	160.4	
Specific Conductance	EPA	120.1	
Sulfate	EPA	300.0	
Sulfide	EPA	376.1	
Total Organic Carbon	EPA	415.1	
Total Organic Halides	EPA	9020	
Turbidity	EPA	180.1	
Aluminum	EPA	200.7	
Aluminum	EPA	6010	
Antimony	EPA	200.7	
Antimony	EPA	204.2	
Antimony	EPA	6010	
Antimony	EPA	7041	
Arsenic	EPA	200.7	
Arsenic	EPA	206.2	
Arsenic	EPA	6010	
Arsenic	EPA	7060	
Barium	EPA	200.7	
Barium	EPA	6010	
Beryllium	EPA	200.7	
Beryllium	EPA	6010	
Boron	EPA	200.7	
Boron	EPA	6010	
Cadmium	EPA	200.7	
Cadmium	EPA	213.2	
Cadmium	EPA	6010	
Cadmium	EPA	7131	
Calcium	EPA	200.7	
Calcium	EPA	6010	
Chromium	EPA	200.7	
Chromium	EPA	6010	
Chromium, Hexavalent	SM	3500-Cr B	
Chromium, Hexavalent	ASTM	D1687-92	
Cobalt	EPA	200.7	
Cobalt	EPA	6010	
Copper	EPA	200.7	
Copper	EPA	6010	

Parameter Name	Reference	Method Number	Notes
Gold	EPA	231.2	
Hardness, Total (as CaCO3)	EPA	200.7	
Hardness, Total (as CaCO3)	EPA	6010	
Iron	EPA	200.7	
Iron	EPA	6010	
Lead	EPA	200.7	
Lead	EPA	239.2	
Lead	EPA	6010	
Lead	EPA	7421	
Lithium	EPA	200.7	
Lithium	EPA	6010	
Magnesium	EPA	200.7	
Magnesium	EPA	6010	
Manganese	EPA	200.7	
Manganese	EPA	6010	
Mercury	EPA	245.1	
Mercury	EPA	7470	
Mercury	EPA	7471	
Molybdenum	EPA	6010	
Molybdenum	EPA	200.7	
Nickel	EPA	200.7	
Nickel	EPA	6010	
Potassium	EPA	200.7	
Potassium	EPA	6010	
Selenium	EPA	200.7	
Selenium	EPA	270.2	
Selenium	EPA	6010	
Selenium	EPA	7740	
Silica	EPA	200.7	
Silver	EPA	200.7	
Silver	EPA	272.2	
Silver	EPA	6010	
Silver	EPA	7761	
Sodium	EPA	200.7	
Sodium	EPA	6010	
Strontium	EPA	200.7	
Strontium	EPA	6010	

Parameter Name	Reference	Method Number	Notes
Thallium	EPA	200.7	
Thallium	EPA	279.2	
Thallium	EPA	6010	
Thallium	EPA	7841	
Titanium	EPA	200.7	
Titanium	EPA	6010	
Vanadium	EPA	200.7	
Vanadium	EPA	6010	
Zinc	EPA	200.7	
Zinc	EPA	6010	
BTEX	EPA	8021	
Organochlorine Pesticides	EPA	608	
Organochlorine Pesticides	EPA	8081	
Polychlorinated Biphenyls	EPA	608	
Polychlorinated Biphenyls	EPA	8082	
Total Pet Hydrocarbons - Diesel	WDOE	NWTPH-Dx	1,2
Total Pet Hydrocarbons - Gasoline	WDOE	NWTPH-Gx	1,2
BNA Extr (Semivolatile) Organics	EPA	625	
BNA Extr (Semivolatile) Organics	EPA	8270	
Volatile Organic Compounds	EPA	624	
Volatile Organic Compounds	EPA	8260	

#### Accredited Parameter Note Detail

(1) Analytical Methods for Petroleum Hydrocarbons, Publication No. ECY 97-602, June 1997. (2) Provisional pending an acceptable performance evaluation result (WAC 173-50-110). n (3) Interim pending an on-site assessment of the lab's analytical capability (WAC 173-50-100).



Authentication Signature

Perry Brake -- Unit Supervisor, Washington State Department of Ecology -- Lab Accreditation Unit

# STATE OF WASHINGTON

## DEPARTMENT OF HEALTH

### DRINKING WATER TESTING LABORATORY CERTIFICATION PROGRAM

**SVL Analytical, Inc.**  
**One Government Gulch**  
**P.O. Box 929**  
**Kellogg, ID 83837-0929**  
WASHINGTON CODE: #050

having met the requirements of the Regulations Governing Laboratory Certification and Standard of Performance for WAC 246 - 390 et. seq.  
is hereby approved as a

### STATE CERTIFIED DRINKING WATER LABORATORY

(per reciprocity agreement with the State of Idaho)

To perform drinking water analyses for:

**CHEMISTRY**

Issued in Seattle on:

4/25/2002

By

Marina Silverstone

Marina Silverstone, Acting Office Director  
D.W. Laboratory Certification Program

This Contract is accepted for Laboratory by:

\_\_\_\_\_

EXPIRATION DATE

July 31, 2003

DATE

\_\_\_\_\_

TO BE CONSPICUOUSLY DISPLAYED AT THE LABORATORY WITH THE ANNUAL CERTIFIED PARAMETER LIST



APPENDIX E

**APPENDIX E**

**Dust Monitoring Procedures**

## Method 9 -- Visual Determination of the Opacity of Emissions From Stationary Sources

Many stationary sources discharge visible emissions into the atmosphere; these emissions are usually in the shape of a plume. This method involves the determination of plume opacity by qualified observers. The method includes procedures for the training and certification of observers, and procedures to be used in the field for determination of plume opacity. The appearance of a plume as viewed by an observer depends upon a number of variables, some of which may be controllable and some of which may not be controllable in the field. Variables which can be controlled to an extent to which they no longer exert a significant influence upon plume appearance include: Angle of the observer with respect to the plume; angle of the observer with respect to the sun; point of observation of attached and detached steam plume; and angle of the observer with respect to a plume emitted from a rectangular stack with a large length to width ratio. The method includes specific criteria applicable to these variables.

Other variables which may not be controllable in the field are luminescence and color contrast between the plume and the background against which the plume is viewed. These variables exert an influence upon the appearance of a plume as viewed by an observer, and can affect the ability of the observer to accurately assign opacity values to the observed plume. Studies of the theory of plume opacity and field studies have demonstrated that a plume is most visible and presents the greatest apparent opacity when viewed against a contrasting background. It follows from this, and is confirmed by field trials, that the opacity of a plume, viewed under conditions where a contrasting background is present can be assigned with the greatest degree of accuracy. However, the potential for a positive error is also the greatest when a plume is viewed under such contrasting conditions. Under conditions presenting a less contrasting background, the apparent opacity of a plume is less and approaches zero as the color and luminescence contrast decrease toward zero. As a result, significant negative bias and negative errors can be made when a plume is viewed under less contrasting conditions. A negative bias decreases rather than increases the possibility that a plant operator will be cited for a violation of opacity standards due to observer error.

Studies have been undertaken to determine the magnitude of positive errors which can be made by qualified observers while reading plumes under contrasting conditions and using the procedures set forth in this method. The results of these studies (field trials) which involve a total of 769 sets of 25 readings each are as follows:

(1) For black plumes (133 sets at a smoke generator), 100 percent of the sets were read with a positive error of less than 7.5 percent opacity; 99 percent were read with a positive error of less than 5 percent opacity.

1 For a set, positive error = average opacity determined by observers' 25 observations -- average opacity determined from transmissometer's 25 recordings.

(2) For white plumes (170 sets at a smoke generator, 168 sets at a coal-fired power plant, 298 sets at a sulfuric acid plant), 99 percent of the sets were read with a positive error of less than 7.5 percent opacity; 95 percent were read with a positive error of less than 5 percent opacity.

The positive observational error associated with an average of twenty-five readings is therefore established. The accuracy of the method must be taken into account when determining possible violations of applicable opacity standards. 1. *Principle and Applicability*

1.1 Principle. The opacity of emissions from stationary sources is determined visually by a qualified observer.

1.2 Applicability. This method is applicable for the determination of the opacity of emissions from stationary sources pursuant to § 60.11(b) and for qualifying observers for visually determining opacity of emissions. 2. *Procedures*

The observer qualified in accordance with section 3 of this method shall use the following procedures for visually determining the opacity of emissions:

2.1 Position. The qualified observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented in the 140° sector to his back. Consistent with maintaining the above requirement, the observer shall, as much as possible, make his observations from a position such that his line of vision is approximately perpendicular to the plume direction, and when observing opacity of emissions from rectangular outlets (e.g., roof monitors, open baghouses, noncircular stacks), approximately perpendicular to the longer axis of the outlet. The observer's line of sight should not include more than one plume at a time when multiple stacks are involved, and in any case the observer should make his observations with his line of sight perpendicular to the longer axis of such a set of multiple stacks (e.g., stub stacks on baghouses).

2.2 Field Records. The observer shall record the name of the plant, emission location, type facility, observer's name and affiliation, a sketch of the observer's position relative to the source, and the date on a field data sheet (Figure 9-1). The time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), and plume background are recorded on a field data sheet at the time opacity readings are initiated and completed.

2.3 Observations. Opacity observations shall be made at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. The observer shall not look continuously at the plume, but instead shall observe the plume momentarily at 15-second intervals.

2.3.1 Attached Steam Plumes. When condensed water vapor is present within the plume as it emerges from the emission outlet, opacity observations shall be made beyond the point in the plume at which condensed water vapor is no longer visible. The observer shall record the approximate distance from the emission outlet to the point in the plume at which the observations are made.

2.3.2 Detached Steam Plume. When water vapor in the plume condenses and becomes visible at a distinct distance from the emission outlet, the opacity of emissions should be evaluated at the emission outlet prior to the condensation of water vapor and the formation of the steam plume.

2.4 Recording Observations. Opacity observations shall be recorded to the nearest 5 percent at 15-second intervals on an observational record sheet. (See Figure 9-2 for an example.) A minimum of 24 observations shall be recorded. Each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period.

2.5 Data Reduction. Opacity shall be determined as an average of 24 consecutive observations recorded at 15-second intervals. Divide the observations recorded on the record sheet into sets of 24 consecutive observations. A set is composed of any 24 consecutive observations. Sets need not be consecutive in time and in no case shall two sets overlap. For each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24. If an applicable standard specifies an averaging time requiring more than 24 observations, calculate the average for all observations made during the specified time period. Record the average opacity on a record sheet. (See Figure 9-1 for an example.) 3. *Qualifications and Testing*

3.1 Certification Requirements. To receive certification as a qualified observer, a candidate must be tested and demonstrate the ability to assign opacity readings in 5 percent increments to 25 different black plumes and 25 different white plumes, with an error not to exceed 15 percent opacity on any one reading and an average error not to exceed 7.5 percent opacity in each category. Candidates shall be tested according to the procedures described in section 3.2. Smoke generators used pursuant to section 3.2 shall be equipped with a smoke meter which meets the requirements of section 3.3.

The certification shall be valid for a period of 6 months, at which time the qualification procedure must be repeated by any observer in order to retain certification.

3.2 Certification Procedure. The certification test consists of showing the candidate a complete run of 50 plumes -- 25 black plumes and 25 white plumes -- generated by a smoke generator. Plumes within each set of 25 black and 25 white runs shall be presented in random order. The candidate assigns an opacity value to each plume and records his observation on a suitable form. At the completion of each run of 50 readings, the score of the candidate is determined. If a candidate fails to qualify, the complete run of 50 readings must be repeated in any retest. The smoke test may be administered as part of a smoke school or training program, and may be preceded by training or familiarization runs of the smoke generator during which candidates are shown black and white plumes of known opacity.

3.3 Smoke Generator Specifications. Any smoke generator used for the purposes of section 3.2 shall be equipped with a smoke meter installed to measure opacity across the diameter of the smoke generator stack. The smoke meter output shall display instack opacity based upon a pathlength equal to the stack exit diameter, on a full 0 to 100 percent chart recorder scale. The smoke meter optical design and performance shall meet the specifications shown in Table 9-1. The smoke meter shall be calibrated as prescribed in section 3.3.1 prior to the conduct of each smoke reading test. At the completion of each test, the zero and span drift shall be checked and if the drift exceeds  $\pm 1$  percent opacity, the condition shall be corrected prior to conducting any subsequent test runs. The smoke meter shall be demonstrated, at the time of installation, to meet the specifications listed in Table 9-1. This demonstration shall be repeated following any subsequent repair or replacement of the photocell or associated electronic circuitry including the chart recorder or output meter, or every 6 months, whichever occurs first.

Table 9-1--Smoke Meter Design and Performance Specifications

Parameter	Specification
a. Light source.....	Incandescent lamp operated at nominal rated voltage.
b. Spectral response of photocell.....	Photopic (daylight spectral response of the human eye-- Citation 3).
c. Angle of view.....	15 deg. maximum total angle.
d. Angle of projection.....	15 deg. maximum total angle.
e. Calibration error.....	<plus-minus>3% opacity, maximum.
f. Zero and span drift.....	<plus-minus>1% opacity, 30 minutes.
g. Response time.....	5 seconds.

3.3.1 Calibration. The smoke meter is calibrated after allowing a minimum of 30 minutes warmup by alternately producing simulated opacity of 0 percent and 100 percent. When stable response at 0 percent or 100 percent is noted, the smoke meter is adjusted to produce an output of 0 percent or 100 percent, as



Company Observer.....  
 Location Type facility.....  
 Test Number Point of emissions.....  
 Date

Hr.	Min.	Seconds				Steam plume (check if applicable)	
		0	15	30	45	Attached	Detached
	0						
	1						
	2						
	3						
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						
	13						
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Figure 9-2--Observation Record (Continued)

Page \_\_\_\_ of \_\_\_\_

Company	Observer.....	.....
Location	Type facility.....	.....
Test Number	Point of emissions.....	.....
Date		

Hr.	Min.	Seconds				Steam plume (check if applicable)	
		0	15	30	45	Attached	Detached
	30						
	31						
	32						
	33						
	34						
	35						
	36						
	37						
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3.3.2.3 Angle of View. Check construction geometry to ensure that the total angle of view of the smoke plume, as seen by the photocell, does not exceed 15°. The total angle of view may be calculated from:  $\theta = 2 \tan^{-1} d/2L$ , where  $\theta$ =total angle of view; d=the sum of the photocell diameter+the diameter of the limiting aperture; and L=the distance from the photocell to the limiting aperture. The limiting aperture is the point in the path between the photocell and the smoke plume where the angle of view is most restricted. In smoke generator smoke meters this is normally an orifice plate.

3.3.2.4 Angle of Projection. Check construction geometry to ensure that the total angle of projection of the lamp on the smoke plume does not exceed 15°. The total angle of projection may be calculated from:  $\theta = 2 \tan^{-1} d/2L$ , where  $\theta$ =total angle of projection; d= the sum of the length of the lamp filament + the diameter of the limiting aperture; and L= the distance from the lamp to the limiting aperture.

3.3.2.5 Calibration Error. Using neutral-density filters of known opacity, check the error between the actual response and the theoretical linear response of the smoke meter. This check is accomplished by first calibrating the smoke meter according to 3.3.1 and then inserting a series of three neutral-density filters of nominal opacity of 20, 50, and 75 percent in the smoke meter pathlength. Filters calibrated within  $\pm 2$  percent shall be used. Care should be taken when inserting the filters to prevent stray light from affecting the meter. Make a total of five nonconsecutive readings for each filter. The maximum error on any one reading shall be 3 percent opacity.

3.3.2.6 Zero and Span Drift. Determine the zero and span drift by calibrating and operating the smoke generator in a normal manner over a 1-hour period. The drift is measured by checking the zero and span at the end of this period.

3.3.2.7 Response Time. Determine the response time by producing the series of five simulated 0 percent and 100 percent opacity values and observing the time required to reach stable response. Opacity values of 0 percent and 100 percent may be simulated by alternately switching the power to the light source off and on while the smoke generator is not operating. 4. *Bibliography.*

1. Air Pollution Control District Rules and Regulations, Los Angeles County Air Pollution Control District, Regulation IV, Prohibitions, Rule 50.

2. Weisburd, Melvin I., Field Operations and Enforcement Manual for Air, U.S. Environmental Protection Agency, Research Triangle Park, NC. APTD-1100, August 1972, pp. 4.1-4.36.

3. Condon, E.U., and Odishaw, H., Handbook of Physics, McGraw-Hill Co., New York, NY, 1958, Table 3.1, p. 6-52.



**Method 22 -- Visual Determination of Fugitive Emissions From Material Sources and Smoke Emissions From Flares**

**Note:** This method is not inclusive with respect to observer certification. Some material is incorporated by reference from Method 9.

**1.0 Scope and Application**

This method is applicable for the determination of the frequency of fugitive emissions from stationary sources, only as specified in an applicable subpart of the regulations. This method also is applicable for the determination of the frequency of visible smoke emissions from flares.

**2.0 Summary of Method**

2.1 Fugitive emissions produced during material processing, handling, and transfer operations or smoke emissions from flares are visually determined by an observer without the aid of instruments.

2.2 This method is used also to determine visible smoke emissions from flares used for combustion of waste process materials.

2.3 This method determines the amount of time that visible emissions occur during the observation period (*i.e.*, the accumulated emission time). This method does not require that the opacity of emissions be determined. Since this procedure requires only the determination of whether visible emissions occur and does not require the determination of opacity levels, observer certification according to the procedures of Method 9 is not required. However, it is necessary that the observer is knowledgeable with respect to the general procedures for determining the presence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training is to be obtained from written materials found in References 1 and 2 or from the lecture portion of the Method 9 certification course.

**3.0 Definitions**

3.1 *Emission frequency* means the percentage of time that emissions are visible during the observation period.

3.2 *Emission time* means the accumulated amount of time that emissions are visible during the observation period.

3.3 *Fugitive emissions* means emissions generated by an affected facility which is not collected by a capture system and is released to the atmosphere. This includes emissions that (1) escape capture by process equipment exhaust hoods; (2) are emitted during material transfer; (3) are emitted from buildings housing material processing or handling equipment; or (4) are emitted directly from process equipment.

3.4 *Observation period* means the accumulated time period during which observations are conducted, not to be less than the period specified in the applicable regulation.

3.5 *Smoke emissions* means a pollutant generated by combustion in a flare and occurring immediately downstream of the flame. Smoke occurring within the flame, but not downstream of the flame, is not considered a smoke emission.

Code of Federal Regulations Search Results

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#### 4.0 Interferences

4.1 Occasionally, fugitive emissions from sources other than the affected facility (*e.g.*, road dust) may prevent a clear view of the affected facility. This may particularly be a problem during periods of high wind. If the view of the potential emission points is obscured to such a degree that the observer questions the validity of continuing observations, then the observations shall be terminated, and the observer shall clearly note this fact on the data form.

#### 5.0 Safety

5.1 Disclaimer. This method may involve hazardous materials, operations, and equipment. This test method may not address all of the safety problems associated with its use. It is the responsibility of the user of this test method to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to performing this test method.

#### 6.0 Equipment

6.1 Stopwatches (two). Accumulative type with unit divisions of at least 0.5 seconds.

6.2 Light Meter. Light meter capable of measuring illuminance in the 50 to 200 lux range, required for indoor observations only.

7.0 Reagents and Supplies. [Reserved]

8.0 Sample Collection, Preservation, Storage, and Transfer. [Reserved]

9.0 Quality Control. [Reserved]

10.0 Calibration and Standardization. [Reserved]

#### 11.0 Analytical Procedure

11.1 Selection of Observation Location. Survey the affected facility, or the building or structure housing the process to be observed, and determine the locations of potential emissions. If the affected facility is located inside a building, determine an observation location that is consistent with the requirements of the applicable regulation (*i.e.*, outside observation of emissions escaping the building/structure or inside observation of emissions directly emitted from the affected facility process unit). Then select a position that enables a clear view of the potential emission point(s) of the affected facility or of the building or structure housing the affected facility, as appropriate for the applicable subpart. A position at least 4.6 m (15 feet), but not more than 400 m (0.25 miles), from the emission source is recommended. For outdoor locations, select a position where the sunlight is not shining directly in the observer's eyes.

11.2 Field Records.

11.2.1 Outdoor Location. Record the following information on the field data sheet (Figure 22-1): Company name, industry, process unit, observer's name, observer's affiliation, and date. Record also the

estimated wind speed, wind direction, and sky condition. Sketch the process unit being observed, and note the observer location relative to the source and the sun. Indicate the potential and actual emission points on the sketch.

11.2.2 Indoor Location. Record the following information on the field data sheet (Figure 22-2): Company name, industry, process unit, observer's name, observer's affiliation, and date. Record as appropriate the type, location, and intensity of lighting on the data sheet. Sketch the process unit being observed, and note the observer location relative to the source. Indicate the potential and actual fugitive emission points on the sketch.

11.3 Indoor Lighting Requirements. For indoor locations, use a light meter to measure the level of illumination at a location as close to the emission source(s) as is feasible. An illumination of greater than 100 lux (10 foot candles) is considered necessary for proper application of this method.

#### 11.4 Observations.

11.4.1 Procedure. Record the clock time when observations begin. Use one stopwatch to monitor the duration of the observation period. Start this stopwatch when the observation period begins. If the observation period is divided into two or more segments by process shutdowns or observer rest breaks (see Section 11.4.3), stop the stopwatch when a break begins and restart the stopwatch without resetting it when the break ends. Stop the stopwatch at the end of the observation period. The accumulated time indicated by this stopwatch is the duration of observation period. When the observation period is completed, record the clock time. During the observation period, continuously watch the emission source. Upon observing an emission (condensed water vapor is not considered an emission), start the second accumulative stopwatch; stop the watch when the emission stops. Continue this procedure for the entire observation period. The accumulated elapsed time on this stopwatch is the total time emissions were visible during the observation period (*i.e.*, the emission time.)

11.4.2 Observation Period. Choose an observation period of sufficient length to meet the requirements for determining compliance with the emission standard in the applicable subpart of the regulations. When the length of the observation period is specifically stated in the applicable subpart, it may not be necessary to observe the source for this entire period if the emission time required to indicate noncompliance (based on the specified observation period) is observed in a shorter time period. In other words, if the regulation prohibits emissions for more than 6 minutes in any hour, then observations may (optional) be stopped after an emission time of 6 minutes is exceeded. Similarly, when the regulation is expressed as an emission frequency and the regulation prohibits emissions for greater than 10 percent of the time in any hour, then observations may (optional) be terminated after 6 minutes of emission are observed since 6 minutes is 10 percent of an hour. In any case, the observation period shall not be less than 6 minutes in duration. In some cases, the process operation may be intermittent or cyclic. In such cases, it may be convenient for the observation period to coincide with the length of the process cycle.

11.4.3 Observer Rest Breaks. Do not observe emissions continuously for a period of more than 15 to 20 minutes without taking a rest break. For sources requiring observation periods of greater than 20 minutes, the observer shall take a break of not less than 5 minutes and not more than 10 minutes after every 15 to 20 minutes of observation. If continuous observations are desired for extended time periods, two observers can alternate between making observations and taking breaks.

11.5 Recording Observations. Record the accumulated time of the observation period on the data sheet as the observation period duration. Record the accumulated time emissions were observed on the data sheet as the emission time. Record the clock time the observation period began and ended, as well

as the clock time any observer breaks began and ended.

#### 12.0 Data Analysis and Calculations

If the applicable subpart requires that the emission rate be expressed as an emission frequency (in percent), determine this value as follows: Divide the accumulated emission time (in seconds) by the duration of the observation period (in seconds) or by any minimum observation period required in the applicable subpart, if the actual observation period is less than the required period, and multiply this quotient by 100.

#### 13.0 Method Performance. [Reserved]

#### 14.0 Pollution Prevention. [Reserved]

#### 15.0 Waste Management. [Reserved]

#### 16.0 References

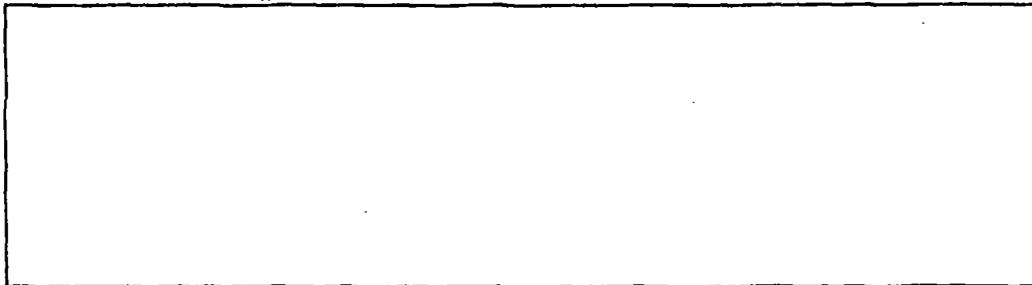
1. Missan, R., and A. Stein. Guidelines for Evaluation of Visible Emissions Certification, Field Procedures, Legal Aspects, and Background Material. EPA Publication No. EPA-340/1-75-007. April 1975.
2. Wohlschlegel, P., and D.E. Wagoner. Guideline for Development of a Quality Assurance Program: Volume IX -- Visual Determination of Opacity Emissions from Stationary Sources. EPA Publication No. EPA-650/4-74-005i. November 1975.

#### 17.0 Tables, Diagrams, Flowcharts, and Validation Data

FUGITIVE OR SMOKE EMISSION INSPECTION  
OUTDOOR LOCATION

Company Location Company Rep.	Observer Affiliation Date
Sky Conditions Precipitation	Wind Direction Wind Speed
Industry	Process Unit

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
End Observation	_____	_____	_____

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION  
INDOOR LOCATION

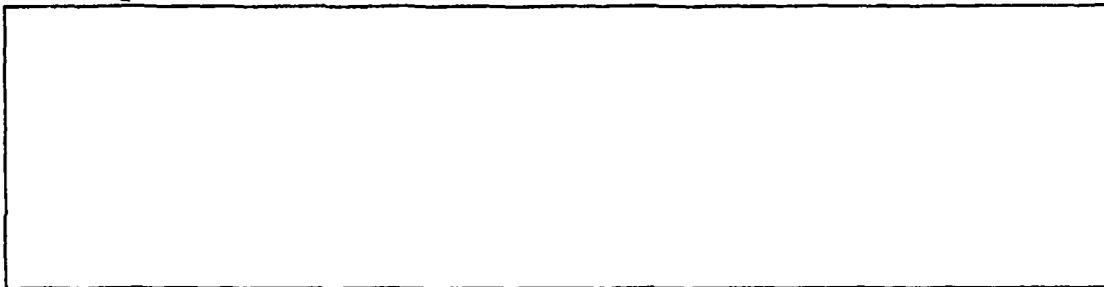
Company  
Location  
Company Rep.

Observer  
Affiliation  
Date

Industry

Process Unit

Light type (fluorescent, incandescent, natural)  
Light location (overhead, behind observer, etc.)  
Illuminance (lux or footcandles)  
Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
End Observation	_____	_____	_____

Figure 22-2



**APPENDIX F**

**Dewatering Pit Sampling to Support Remedial Design**

## **Appendix F**

### **Dewatering Pit Sampling to Support Remedial Design**

This appendix describes sampling activities performed to support remedial design for the Dewatering Pit in the Simplot Plant Area of the Eastern Michaud Flats Superfund Site.

The sampling was performed in accordance with *Dewatering Pit Sampling and Analysis Plan to Support Remedial Design* (SAP; prepared for the J.R. Simplot Company by MFG, Inc., October 10, 2002). The goal of the sampling was to determine if the residual solids, when excavated, would exhibit the toxicity characteristic, as determined by the Toxicity Characteristic Leaching Procedure (TCLP) test or the corrosivity characteristic, as determined by EPA Method 9040B. If the solids exhibit the toxicity or corrosivity characteristic, relocation to the gypsum stack would not be appropriate and the scope of the remedy for the Dewatering Pit would have required reevaluation. If the solids do not, then relocation of the excavated material to the gypsum stack is appropriate.

Sample locations were marked with flags prior to sampling and all sample collection, handling and analysis were performed as described in the SAP. The weather was sunny with light winds from the north at approximately 5 to 10 miles per hour. Composite samples were collected on the afternoon of October 16 by Dennis Bowman and Jeanine Strong of the J.R. Simplot Company at the following locations:

- West Pit (Sample ID: EMF-DWP-1002-W1)
- South Pit (Sample ID: EMF-DWP-1002-S1)
- East Pit (Sample ID: EMF-DWP-1002-E1)
- East Pit duplicate (Sample ID: EMF-DWP-1002-E2)

Samples were securely closed, custody seals applied and bagged, and placed on blue ice in a cooler for transport. A copy of the field notebook is provided as Attachment A. Samples were shipped to SVL Analytical, Inc. on October 17 and analyzed for

corrosivity and total metals (in error) on October 22 and for TCLP metals on October 25. Laboratory reports are provided in Attachment B.

The TCLP results are shown in Table 1.

**Table 1  
TCLP Data**

Constituent	Toxicity Characteristic Limit (mg/L)	West Pit TCLP Concentration (mg/L)	South Pit Sample TCLP Concentration (mg/L)	East Pit Sample TCLP Concentration (mg/L)
Arsenic	5.0	0.035	0.026	0.073
Barium	100.0	0.0723	0.0867	0.0535
Cadmium	1.0	0.102	0.0409	0.110
Chromium	5.0	<0.0060	0.0284	0.0063
Lead	5.0	0.0067	<0.005	0.0062
Mercury	0.2	<0.00020	<0.00020	<0.00020
Selenium	1.0	0.029	0.022	0.053
Silver	5.0	<0.0050	<0.0050	<0.0050

As shown, measured TCLP concentrations were all below the Toxicity Characteristic regulatory limits and therefore the Dewatering Pit solids are not classified as Toxicity Characteristic hazardous waste. Corrosivity data are shown in Table 2.

**Table 2  
Corrosivity Data**

Corrosive Waste pH	West Pit pH	South Pit pH	East Pit pH
<2 or >12	5.8	7.3	5.3

A solid waste exhibits the characteristic of corrosivity if a representative sample is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5. Therefore, the Dewatering Pit solids are not corrosive.

Data quality was evaluated per the SAP with the following findings.

#### Sample Collection, Transfer and Handling

Four soil samples were collected on October 16, 2002 and submitted to SVL Laboratories for TCLP metals and mercury under lab sample group 103716. The sample temperature upon receipt at the laboratory was 10 °C. All samples were extracted and analyzed within the recommended holding times for each method.

#### Accuracy

The accuracy of the data was evaluated based on the laboratory control sample recoveries, matrix spike recoveries and blank sample results. All laboratory control sample recoveries were within the laboratory control limits. The matrix spike recoveries were within the laboratory control limits except for selenium. A post-digestion spike was performed for selenium, and the recovery was within laboratory control limits.

Qualification of the data is not required. The analytes of interest were not detected in any method blanks. Field blanks were not submitted with this sample set.

#### Precision

The precision was evaluated based on the relative percent difference (RPD) between laboratory replicate and field duplicate sample results. All laboratory replicate RPDs and field duplicate RPDs were within the laboratory control limits and project precision limits.

#### Data Qualifications based on Data Evaluation

The analytical data did not require qualification based on the data evaluation. The data is considered usable as reported.

The data evaluation checklist is included as Attachment B.

**Attachment A**  
**Copy of the Field Notebook**

EMF - FTL - #1

OCTOBER 2002 -

# RECORD

## S295-15R

S295-15R    Record Ruled - 32 lines, 150 pages  
S295-3R    Record Ruled - 32 lines, 300 pages



**Wilson Jones®**

ACCO Brands, Inc.  
300 Tower Parkway  
Lincolnshire, IL 60069-3640

Made in U.S.A.

PROJECT NAME: EASTERN MICHAUD FLATS DEWATERING PIT PROJECT

PROJECT MANAGER: DALE REAVIS

SAMPLING SCOPE: THE DEWATERING PIT PROJECT

CONSISTS OF 3 BERMED AREAS: 1) EASTERN PIT MEASURES ~23,150 ft<sup>2</sup>; 2) WESTERN PIT MEASURES ~15,100 ft<sup>2</sup>; AND 3) SOUTHERN PIT MEASURES ~3,500 ft<sup>2</sup>. THE BERMS ARE ~8-12' HIGH.

THE PITS CONSIST OF RESIDUAL SOLIDS PRECIPITATED BY PH ADJUSTMENT OF LAND APPLICATION WATER (AND POTENTIALLY SOME PHOSPHATE ORE RESIDUALS). THE SOLIDS ARE A GRAY FINE POWDER TO BROWN/GRAY SOIL AND GRAVEL.

A SINGLE COMPOSITE SAMPLE WILL BE COLLECTED FROM EACH OF THE 3 PITS. COMPOSITE SAMPLES WILL REPRESENT SOIL BOTH LATERALLY & VERTICALLY. AT LEAST 1,000 GRAMS OF GRAB WILL BE COLLECTED AND HOMOGENIZED FOR EACH COMPOSITE.

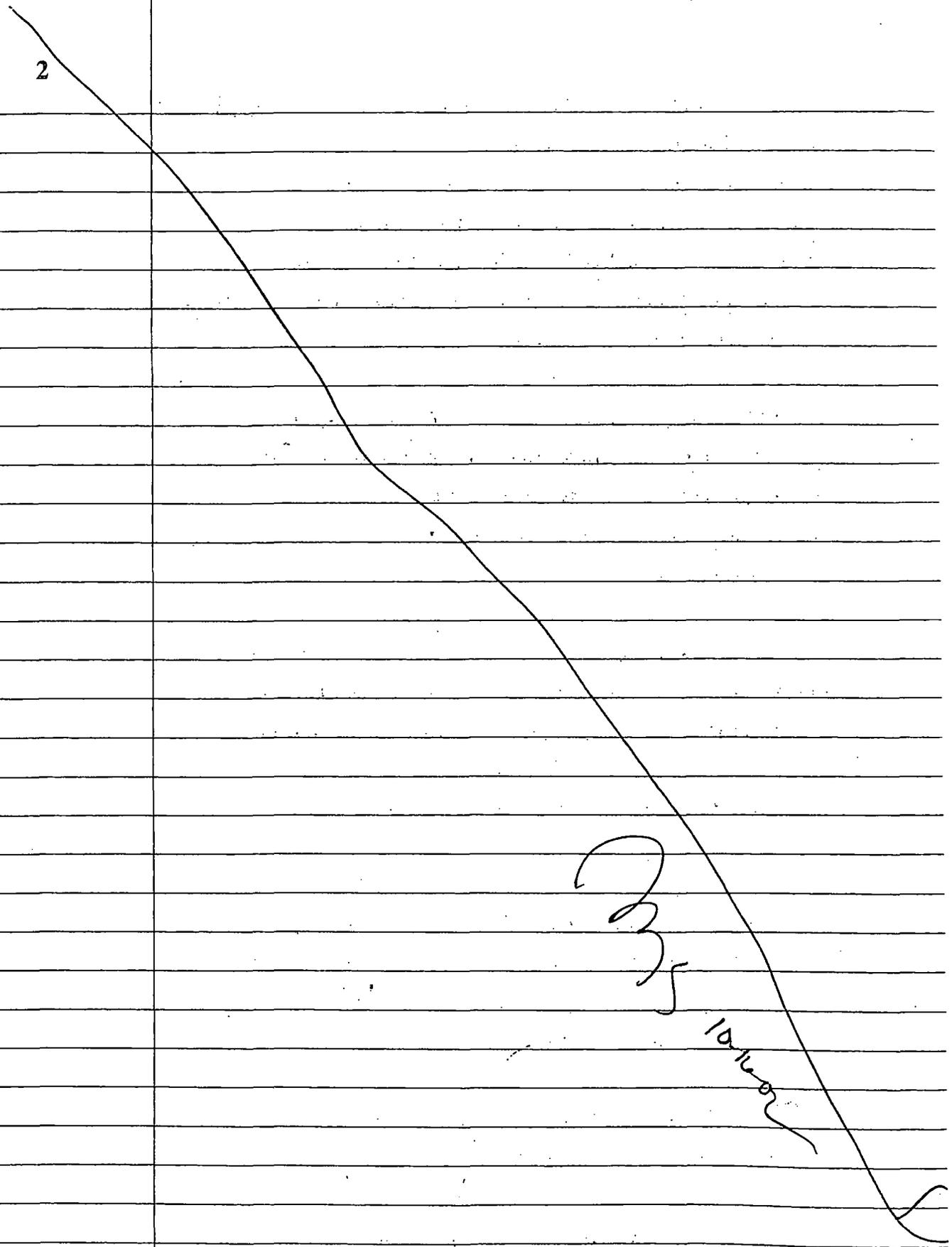
THE WEST PIT IS ANTICIPATED TO BE ~5" CENTER, SHALLOW TOWARDS EDGES. THE EAST PIT IS ANTICIPATED TO BE ~12-14" CENTER, SHALLOW TOWARDS EDGES. SOUTH PIT IS ANTICIPATED TO BE 1/2" OR LESS, THROUGHOUT PIT FLOOR.

FOR QC PURPOSES A DUPLICATE SAMPLE WILL BE PULLED FROM THE EASTERN PIT.

SAMPLES WILL BE TAKEN WITH A STAINLESS STEEL SCOOPULA AND SPINDE AND WILL BE HOMOGENIZED IN A STAINLESS STEEL BOWL.

A-

2



235  
10/16/02

SAMPLES WILL BE PLACED IN GLASS CONTAINERS,  
AND PROPERLY MARKED AND PREPARED FOR SHIPMENT  
OFF-SITE.

SAMPLES WILL BE SHIPPED TO SVL ANALYTICAL,  
IN KELOGG, ID FOR ANALYSIS. SAMPLES WILL  
BE SHIPPED VIA COOLER (w/BLUE) ICE TO SVL.

SAMPLES WILL BE ANALYZED FOR TCU METALS  
& CORROSIIVITY.

SAMPLE PROJECT STARTED @ 1355 10-16-02 - DECON SET-UP

SAMPLE(S): DENNIS BOWMAN & JEANENE SIMONS

DATE: 10-16-02

START TIME: 1424

STOP TIME: 1438

SAMPLE #: EME-DWP-1002-W1

LOCATION: WEST DEWATERING PIT

SAMPLE TYPE/MATRIX: COMPOSITE / POWDER SOLID

SAMPLE CONTAINER: 250ML GLASS

WEATHER CONDITIONS: SUNNY LIGHT WIND 5-10MPH N. 65°

FIELD NOTES:

WG1 - S.S. SPADE ~ 8" 3-SCOOPULAS GRAY-BLACK SOIL - BASE to TOP

WG2 - S.S. SPADE ~ 5" 3-SCOOPULAS GRAY POWDER - BASE TO TOP

WG3 - S.S. SPADE ~ 4" 3-SCOOPULAS GRAY POWDER - BASE TO TOP

WG4 - S.S. SPADE ~ 5" 3-SCOOPULAS GRAY - LT. BROWN POWDER - BASE to TOP

WG5 - S.S. SPADE ~ 3" 3-SCOOPULAS GRAY - LT. BROWN POWDER - BASE to TOP

HOMOGENOUS NO LAYERING NOTED

BS 10-16-02

4

Sample #1

Sample #2

Sample #3

Sample #4

Sample #5

Sample #6

Sample #7

Sample #8

Sample #9

Sample #10

BS

10-16-02

SAMPLER(S): DENNIS BOWMAN & JEANESE BENSON SIMONS

DATE: 10-16-07

START TIME: 1454

STOP TIME: 1503

SAMPLE #: EMF-DWP-1002-S1

LOCATION: SOUTH DEWATERING PLOT

SAMPLE TYPE/MATRIX: COMPOSITE / GRAY POWDER w/ SOLIDS, SOIL, GRAVEL

SAMPLE CONTAINER: 250ml GLASS

WEATHER CONDITIONS: SUNNY LIGHT WINDS 65° < 10MPH WIND N

FIELD NOTES:

- SG1 S.S. SCOOPULA ~ 1/2" 3 SCOOPULAS GRAY POWDER & GRAY SOLIDS <sup>B to T</sup>
  - SG3 S.S. SCOOPULA ~ 1 1/2" 3 SCOOPULAS GRAY TO BROWN GRAVEL/SOIL MATRIX <sup>B to T</sup>
  - SG2 S.S. SCOOPULA ~ 1/2" 3 SCOOPULAS GRAY POWDER & GRAY SOLIDS <sup>B to T</sup>
- HOMOGENEOUS → NO LAYERING NOTED

SAMPLER(S): JEANESE SIMONS; DENNIS BOWMAN

DATE: 10-16-07

START TIME: 1520

STOP TIME: 1541

SAMPLE #: EMF-DWP-1002-E1

LOCATION: EAST DEWATERING PLOT

SAMPLE TYPE/MATRIX: COMPOSITE / GRAY POWDER w/ SOLIDS

SAMPLE CONTAINER: 250ml GLASS

WEATHER CONDITIONS: SUNNY LIGHT WINDS 65° < 10MPH N.

FIELD NOTES:

- EG1 S.S. SPADE ~ 12" 3 SCOOPULAS GRAY TO DK GRAY POWDER w/ ORCAVIL <sup>B to T</sup>
  - EG2 S.S. SPADE ~ 18" 3 SCOOPULAS GRAY TO DK GRAY POWDER w/ SOLIDS <sup>B to T</sup>
  - EG4 S.S. SPADE ~ 24" 3 SCOOPULAS GRAY TO DK GRAY POWDER w/ SOLIDS <sup>B to T</sup>
  - EG5 S.S. SPADE ~ 12" 3 SCOOPULAS GRAY TO DK GRAY POWDER w/ SOLIDS <sup>B to T</sup>
  - EG3 S.S. SPADE ~ 16" 3 SCOOPULAS GRAY TO DK GRAY POWDER w/ SOLIDS <sup>B to T</sup>
- HOMOGENEOUS → NO LAYERING NOTED

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6

2021

BS  
10-16-02

SAMPLER(S): JEANETTE SIDONS & DENNIS BOWMAN

DATE: 10-16-02

START TIME: 1544

STOP TIME: 1546

SAMPLE #: EMF-DWP-100Z-E2

LOCATION: EAST DEWATERING PILL

SAMPLE TYPE/MATRIX: COMPOSITE / GRAY POWDER w/SOLIDS

SAMPLE CONTAINER: 250 mL GLASS

WEATHER CONDITIONS: SUNNY LIGHT WINDS N. <10 MPH

FIELD NOTES: DUPLICATE TO EMF-DWP-100Z-E1

MJS 10-16-02





10/16/02

EMF-DWP-EAR PLT



I-86 (EASTBOUND)

LEGEND:



APPROXIMATE AREA OF RESIDUALS



APPROXIMATE SAMPLING LOCATIONS

- SR → WG5 = 64'
- SR → WG4 = 120'
- WR → WG4 = 41'
- WR → WG3 = 86'
- WR → WG2 = 115'
- WR → WG1 = 152'
- NR → WG4 = 48'
- ER → WG1 = 38'

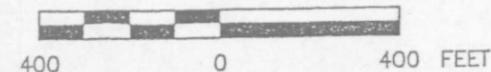
- SR → EG4 = 57'
- SR → EG5 = 75'
- ER → EG1 = 41'
- ER → EG2 = 123'

- NR → SG1 = 24'
- NR → SG2 = 75'
- ER → SG3 = 45'
- WR → SG3 = 15'



N

SCALE



SIMPLLOT PLANT AREA  
 EASTERN MICHAUD FLATS  
 SUPERFUND SITE  
 POCA TELLO, IDAHO

DEWATERING PIT  
 FIGURE 1  
 DEWATERING PIT  
 SAMPLING LOCATIONS

PROJECT: 010121.4 DATE: AUGUST 2002  
 REV: BY: SCG CHECKED: ACK

MFG, Inc.  
 consulting scientists and engineers



ADDITIONAL NOTES: ALL 4 SAMPLES WERE SECURELY  
CLOSED; CUSTODY SEALS APPLIED; AND <sup>PS</sup> BAGGED;  
AND PLACED ON ICE (BLUE) IN COOLER FOR TRANSPORT.

SPADE, SCOOPULA & COMPOSITE BOWL WERE DECONED  
BETWEEN EACH SAMPLE SET BY THE FOLLOWING  
METHOD: 1) WIPED DOWN (SOLIDS COLLECTED IN  
WASTE BUCKET); 2) RINSED W/ DI WATER <sup>THOROUGHLY</sup>  
(THOROUGHLY); 3) WIPED; AND 4) LIGHT METHANOL  
RINSE & AIR DRY. \*ALL WASTE MATERIALS FROM  
THIS PROCESS CAPTURED IN WASTE BUCKET.

CHAIN-OF-CUSTODY FILLED OUT IN THE FIELD.  
SAMPLES, COOLER, C.O.C. & LOGBOOK VERIFIED BY  
PROJECT MANAGER. C.O.C. & LETTER TO SVL  
TUCKED INSIDE COOLER (PROTECTIVE SHEETING),  
AND COOLER WAS SECURELY CLOSED W/ CLEAR  
PACKING TAPE & CUSTODY SEALS APPLIED. SITE CLEANUP

DUE TO THE TIME OF DAY, SAMPLES WILL BE  
KEPT IN LOCKED ENVIRONMENTAL OFFICE  
OVERNIGHT & SHIPPED TO SVL ANALYTICAL  
VIA UPS 10-17-02.

~~MS 10-16-02~~

**Attachment B**  
**Laboratory Reports and Data Evaluation Checklist**

SVL ANALYTICAL, INC.

One Government Gulch ■ P.O. Box 929 ■ Kellogg, Idaho 83837-0929 ■ Phone: (208)784-1258 ■ Fax: (208)783-0891

REPORT OF ANALYTICAL RESULTS (TCLP)

CLIENT : JR SIMPLOT SVL JOB # : 103716  
SVL SAMPLE # : 315025  
CLIENT SAMPLE ID: EMF-DWP-1002-W1  
Sample Collected: 10/16/02 14:38 Sample Matrix: Solid Waste  
Sample Receipt : 10/23/02 Extraction : TCLP \*\*  
Date of Report : 10/28/02 Extracted: 10/24/02

Determination	Result	Units	TCLP Reg. Limit	Method	Analysis Date
Silver	<0.0050	mg/L Ext	5.0	6010B	10/25/02
Arsenic	0.035	mg/L Ext	5.0	6010B	10/25/02
Barium	0.0723	mg/L Ext	100.0	6010B	10/25/02
Cadmium	0.102	mg/L Ext	1.0	6010B	10/25/02
Chromium	<0.0060	mg/L Ext	5.0	6010B	10/25/02
Mercury	<0.00020	mg/L Ext	0.2	7470	10/25/02
Lead	0.0067	mg/L Ext	5.0	6010B	10/25/02
Selenium	0.029	mg/L Ext	1.0	6010B	10/25/02

\*\* Sample extracted according to EPA method 1311 (TCLP).  
Certificate: ID ID00019

Reviewed By: Blake Johnson Date 10/28/02  
10/28/02 9:23

SVL ANALYTICAL, INC.

One Government Gulch ■ P.O. Box 929 ■ Kellogg, Idaho 83837-0929 ■ Phone: (208)784-1258 ■ Fax: (208)783-0891

REPORT OF ANALYTICAL RESULTS (TCLP)

CLIENT	: JR SIMPLOT	SVL JOB #	: 103716
		SVL SAMPLE #	: 315026
CLIENT SAMPLE ID:	EMF-DWP-1002-S1	Sample Matrix:	Solid Waste
Sample Collected:	10/16/02 15:03	Extraction	: TCLP **
Sample Receipt	: 10/23/02	Extracted:	10/24/02
Date of Report	: 10/28/02		

Determination	Result	Units	TCLP Reg. Limit	Method	Analysis Date
Silver	<0.0050	mg/L Ext	5.0	6010B	10/25/02
Arsenic	0.026	mg/L Ext	5.0	6010B	10/25/02
Barium	0.0867	mg/L Ext	100.0	6010B	10/25/02
Cadmium	0.0409	mg/L Ext	1.0	6010B	10/25/02
Chromium	0.0284	mg/L Ext	5.0	6010B	10/25/02
Mercury	<0.00020	mg/L Ext	0.2	7470	10/25/02
Lead	<0.0050	mg/L Ext	5.0	6010B	10/25/02
Selenium	0.022	mg/L Ext	1.0	6010B	10/25/02

\*\* Sample extracted according to EPA method 1311 (TCLP).  
Certificate: ID ID00019

Reviewed By: Blake Johnson Date 10/28/02  
10/28/02 9:23

SVL ANALYTICAL, INC.

One Government Gulch ■ P.O. Box 929 ■ Kellogg, Idaho 83837-0929 ■ Phone: (208)784-1258 ■ Fax: (208)783-0891

REPORT OF ANALYTICAL RESULTS (TCLP)

CLIENT	: JR SIMPLOT	SVL JOB #	: 103716
		SVL SAMPLE #	: 315027
CLIENT SAMPLE ID:	EMF-DWP-1002-E1		
Sample Collected:	10/16/02 15:41	Sample Matrix:	Solid Waste
Sample Receipt	: 10/23/02	Extraction	: TCLP **
Date of Report	: 10/28/02	Extracted:	10/24/02

Determination	Result	Units	TCLP Reg. Limit	Method	Analysis Date
Silver	<0.0050	mg/L Ext	5.0	6010B	10/25/02
Arsenic	0.073	mg/L Ext	5.0	6010B	10/25/02
Barium	0.0535	mg/L Ext	100.0	6010B	10/25/02
Cadmium	0.110	mg/L Ext	1.0	6010B	10/25/02
Chromium	0.0063	mg/L Ext	5.0	6010B	10/25/02
Mercury	<0.00020	mg/L Ext	0.2	7470	10/25/02
Lead	0.0062	mg/L Ext	5.0	6010B	10/25/02
Selenium	0.053	mg/L Ext	1.0	6010B	10/25/02

\*\* Sample extracted according to EPA method 1311 (TCLP).  
 Certificate: ID ID00019

Reviewed By: Blake Johnson Date 10/28/02  
 10/28/02 9:23

SVL ANALYTICAL, INC.

One Government Gulch ■ P.O. Box 929 ■ Kellogg, Idaho 83837-0929 ■ Phone: (208)784-1258 ■ Fax: (208)783-0891

REPORT OF ANALYTICAL RESULTS (TCLP)

CLIENT	: JR SIMPLOT	SVL JOB #	: 103716
		SVL SAMPLE #	: 315028
CLIENT SAMPLE ID:	EMF-DWP-1002-E2	Sample Matrix:	Solid Waste
Sample Collected:	10/16/02 15:41	Extraction	: TCLP **
Sample Receipt	: 10/23/02	Extracted:	10/24/02
Date of Report	: 10/28/02		

Determination	Result	Units	TCLP Reg. Limit	Method	Analysis Date
Silver	<0.0050	mg/L Ext	5.0	6010B	10/25/02
Arsenic	0.072	mg/L Ext	5.0	6010B	10/25/02
Barium	0.0502	mg/L Ext	100.0	6010B	10/25/02
Cadmium	0.115	mg/L Ext	1.0	6010B	10/25/02
Chromium	<0.0060	mg/L Ext	5.0	6010B	10/25/02
Mercury	<0.00020	mg/L Ext	0.2	7470	10/25/02
Lead	<0.0050	mg/L Ext	5.0	6010B	10/25/02
Selenium	0.047	mg/L Ext	1.0	6010B	10/25/02

\*\* Sample extracted according to EPA method 1311 (TCLP).  
 certificate: ID ID00019

Reviewed By: Blake Johnson Date 10/28/02  
 10/28/02 9:23

**MFG, INC.**  
**DATA EVALUATION CHECKLIST**

MFG Project No.: **010121**  
Simplot – Dewatering Pit

Lab: **SVL Laboratories – Pocatello, Idaho**

Lab Sample Numbers: **315025 through 315028**

Matrix/Analytical Methods: **Soil/ TCLP Metals by 6010B and TCLP Mercury by 7470**

Field Sample Ids: **EMF-DWP-1002-W1, EMF-DWP-1002-S1, EMF-DWP-1002-E1 and EMF-DWP-1002-E2**

	<u>YES</u>	<u>NO</u>
1. Is a Work Plan, SAP, or QAPP available?	Y	
2. Chain of Custody Records:		
Are the COCs present?	Y	
Are the COCs complete and signed off?	Y	
Were the samples received at or below $4 \pm 2^{\circ}\text{C}$ ?	NA	
<b>The sample temperature upon receipt was <math>10^{\circ}\text{C}</math>.         Specific temperature requirements for storage and handling do not apply to soils.</b>		
Were all samples on the COCs analyzed?	Y	
Were any problems noted?		N
3. Was a project narrative available from the laboratory?		N
Were any problems noted?	NA	
4. Were all holding times met?	Y	
<b>The soil samples were extracted within 8 days of collection and analyzed the next day.</b>		
5. Was the frequency stated in the Work Plan or SAP for field duplicates, equipment rinsate, and trip blanks met?	NA	
6. Were all equipment rinsate blank, trip blank, and method blank results ND?	Y	
<b>The analytes of interest were not detected in the laboratory blank at concentrations greater than the MDLs.     Field blanks were not submitted with this sample set.</b>		
7. Were all matrices, units, and detection limits reported correctly?	Y	
8. Were all surrogate recoveries within control limits?	NA	

	<u>YES</u>	<u>NO</u>
9. Were all LCS spike recoveries within control limits? The LCS recoveries ranged from 98.5% to 104%. Lab control limits were 85% to 115%. LCSDs were not reported.	Y	
10. Were all MS spike recoveries and RPDs within control limits? The MS recoveries were within the range of 97.6% to 128.5%. The lab performed a post-digestion spike for selenium with a 125% recovery. Lab control limits were 75% to 125%. MSDs were not reported.	Y	
11. Were all field duplicate RPDs within control limits? EMF-DWP-1002-E2 is a field duplicate of EMF-DWP-1002-E1. The RPDs for sample results greater than ten times the MDL ranged from 1.4% to 12%. The sample results less than ten times the MDL were within the $\pm 2x$ MDL control limit for precision.	Y	
12. Was the project completeness goal met?	Y	

**Comments:**

Sample Collection, Transfer and Handling

Four soil samples were collected on October 16, 2002 and submitted to SVL Laboratories for TCLP metals and mercury under lab sample group 103716. The sample temperature upon receipt at the laboratory was 10°C. All samples were extracted and analyzed within the recommended holding times for each method.

Accuracy

The accuracy of the data was evaluated based on the laboratory control sample recoveries, matrix spike recoveries and blank sample results. All laboratory control sample recoveries were within the laboratory control limits. The matrix spike recoveries were within the laboratory control limits except for selenium. A post-digestion spike was performed for selenium, and the recovery was within laboratory control limits. Qualification of the data is not required. The analytes of interest were not detected in any method blanks. Field blanks were not submitted with this sample set.

Precision

The precision was evaluated based on the relative percent difference (RPD) between laboratory replicate and field duplicate sample results. All laboratory replicate RPDs and field duplicate RPDs were within the laboratory control limits and project precision limits.

Data Qualifications based on Data Evaluation

The analytical data did not require qualification based on the data evaluation. The data is considered usable as reported.

CLIENT : JR SIMPLOT	SVL JOB: 103690
PROJECT: 65699	SAMPLE: 314830
CLIENT SAMPLE ID: EMF-DWP-1002-W1	
Sample Collected: 10/16/02 14:38	% Solids: 89.8%
Sample Receipt : 10/21/02	Matrix: SOIL
Date of Report : 10/23/02	As Received Basis

Determination	Result	Units	Dilution	Method	Analyzed
Corrosivity	5.8			9045	10/22/02
Silver	4.92	mg/kg		6010B	10/22/02
Arsenic	6.2	mg/kg		6010B	10/22/02
Barium	497	mg/kg		6010B	10/22/02
Cadmium	124	mg/kg		6010B	10/22/02
Chromium	1800	mg/kg		6010B	10/22/02
Mercury	3.57	mg/kg	10	7471	10/22/02
Lead	55.0	mg/kg		6010B	10/22/02
Selenium	9.7	mg/kg		6010B	10/22/02

Reviewed By: Blebe Johnson Date 10/23/02  
 10/23/02 11:30

SVL ANALYTICAL, INC.

Certificate: ID

ID00019

Government Gulch ■ P.O. Box 929 ■ Kellogg, Idaho 83837-0929 ■ Phone: (208)784-1258 ■ Fax: (208)783-0891

CLIENT : JR SIMPLOT	SVL JOB: 103690
PROJECT: 65699	SAMPLE: 314831
CLIENT SAMPLE ID: EMF-DWP-1002-S1	
Sample Collected: 10/16/02 15:03	% Solids: 97.7%
Sample Receipt : 10/21/02	Matrix: SOIL
Date of Report : 10/23/02	As Received Basis

Determination	Result	Units	Dilution	Method	Analyzed
Corrosivity	7.3			9045	10/22/02
Silver	2.17	mg/kg		6010B	10/22/02
Arsenic	5.4	mg/kg		6010B	10/22/02
Barium	418	mg/kg		6010B	10/22/02
Cadmium	83.4	mg/kg		6010B	10/22/02
Chromium	771	mg/kg		6010B	10/22/02
Mercury	0.470	mg/kg		7471	10/22/02
Lead	22.4	mg/kg		6010B	10/22/02
Selenium	1.3	mg/kg		6010B	10/22/02

Reviewed By: Blake Johnson Date 10/23/02  
 10/23/02 11:30

SVL ANALYTICAL, INC.

Certificate: ID

ID00019

Government Gulch ■ P.O. Box 929 ■ Kellogg, Idaho 83837-0929 ■ Phone: (208)784-1258 ■ Fax: (208)783-0891

CLIENT : JR SIMPLOT	SVL JOB: 103690
PROJECT: 65699	SAMPLE: 314832
CLIENT SAMPLE ID: EMF-DWP-1002-E1	
Sample Collected: 10/16/02 15:41	% Solids: 71.4%
Sample Receipt : 10/21/02	Matrix: SOIL
Date of Report : 10/23/02	As Received Basis

Determination	Result	Units	Dilution	Method	Analyzed
Corrosivity	5.3			9045	10/22/02
Silver	3.68	mg/kg		6010B	10/22/02
Arsenic	9.0	mg/kg		6010B	10/22/02
Barium	539	mg/kg		6010B	10/22/02
Cadmium	121	mg/kg		6010B	10/22/02
Chromium	2170	mg/kg		6010B	10/22/02
Mercury	4.60	mg/kg	10	7471	10/22/02
Lead	74.5	mg/kg		6010B	10/22/02
Selenium	4.5	mg/kg		6010B	10/22/02

Reviewed By: Blake Johnson Date 10/23/02  
 10/23/02 11:30

SVL ANALYTICAL, INC.

Certificate: ID

ID00019

Government Gulch ■ P.O. Box 929 ■ Kellogg, Idaho 83837-0929 ■ Phone: (208)784-1258 ■ Fax: (208)783-0891

CLIENT : JR SIMPLOT	SVL JOB: 103690
PROJECT: 65699	SAMPLE: 314833
CLIENT SAMPLE ID: EMF-DWP-1002-E2	
Sample Collected: 10/16/02 15:46	% Solids: 71.1%
Sample Receipt : 10/21/02	Matrix: SOIL
Date of Report : 10/23/02	As Received Basis

Determination	Result	Units	Dilution	Method	Analyzed
Corrosivity	5.4			9045	10/22/02
Silver	3.58	mg/kg		6010B	10/22/02
Arsenic	9.0	mg/kg		6010B	10/22/02
Barium	542	mg/kg		6010B	10/22/02
Cadmium	119	mg/kg		6010B	10/22/02
Chromium	2300	mg/kg		6010B	10/22/02
Mercury	4.66	mg/kg	10	7471	10/22/02
Lead	73.9	mg/kg		6010B	10/22/02
Selenium	3.0	mg/kg		6010B	10/22/02

Reviewed By: Beth Johnson Date 10/23/02  
 10/23/02 11:30

## Part I Prep Blank and Laboratory Control Sample

Client :JR SIMPLOT				SVL JOB No: 103690				
Analyte	Method	Matrix	Units	Prep Blank	True—LCS—Found	LCS %R	Analysis Date	
Silver	6010B	SOIL	mg/kg	<0.50	115	129	112.2	10/22/02
Arsenic	6010B	SOIL	mg/kg	<1.0	192	193	100.5	10/22/02
Barium	6010B	SOIL	mg/kg	<0.20	417	447	107.2	10/22/02
Cadmium	6010B	SOIL	mg/kg	<0.20	125	129	103.2	10/22/02
Chromium	6010B	SOIL	mg/kg	<0.60	133	141	106.0	10/22/02
Lead	6010B	SOIL	mg/kg	<0.50	160	165	103.1	10/22/02
Selenium	6010B	SOIL	mg/kg	<1.0	97.0	96.4	99.4	10/22/02
Mercury	7471	SOIL	mg/kg	<0.0333	24.0	23.1	96.3	10/22/02
Corrosivity	9045	SOIL		5.7	8.6	8.5	98.8	10/22/02

## LEGEND:

LCS = Laboratory Control Sample

LCS %R = LCS Percent Recovery

N/A = Not Applicable

Part II Duplicate and Spike Analysis

Client :JR SIMPLOT		SVL JOB No: 103690									
Test Method	Matrix	QC SAMPLE ID		Duplicate or MSD			Matrix Spike			Analysis	
		Units	Result	Found	RPD%	Result	SPK ADD	%R	Date		
Ag	6010B SOIL	1 mg/kg	2.17	113	M	0.9	114	100	111.8	10/22/02	
As	6010B SOIL	1 mg/kg	5.4	109	M	3.6	113	100	107.6	10/22/02	
Ba	6010B SOIL	1 mg/kg	418	524	M	2.8	539	100	121.0	10/22/02	
Cd	6010B SOIL	1 mg/kg	83.4	177	M	3.9	184	100	100.6	10/22/02	
Cr	6010B SOIL	1 mg/kg	771	912	M	6.7	975	100	R >4S	10/22/02	
Pb	6010B SOIL	1 mg/kg	22.4	115	M	3.4	119	100	96.6	10/22/02	
Se	6010B SOIL	1 mg/kg	1.3	100	M	3.0	103	100	101.7	10/22/02	
Hg	7471 SOIL	1 mg/kg	0.470	0.460		2.2	0.629	0.167	95.2	10/22/02	
% Sol.	999 SOIL	1 %	97.7	97.3		0.4	N/A	N/A	N/A	10/22/02	
CORR	9045 SOIL	1	7.3	7.3		0.0	N/A	N/A	N/A	10/22/02	

LEGEND:

RPD% = ((SAM - DUP)/((SAM + DUP)/2) \* 100) UDL = Both SAM & DUP not detected. \*Result or \*Found: Interference required dilution.  
 R = ((SPK - MSD)/((SPK + MSD)/2) \* 100) M in Duplicate/MSD column indicates MSD.  
 SPK ADD column, A = Post Digest Spike; %R = Percent Recovery N/A = Not Analyzed; R > 4S = Result more than 4X the Spike Added  
 QC Sample 1: SVL SAM No.: 314831 Client Sample ID: EMF-DWP-1002-S1

703690

ENVIRONMENTAL SAMPLE CHAIN OF CUSTODY RECORD					ANALYSIS										SAMPLE DATA/ LAB INSTRUCTIONS			P.O.#:
SAMPLER'S SIGNATURE		DATE		NUMBER AND TYPE OF CONTAINERS	T C P M E T A L S	A N I O N S	V O A S	S E M I V O A S	P C B S	C Y A N I D E	A S B E S T O S	P H	R E F R I G E R A T E D	L A B D I S P O S A L	P R E S E R V A T I V E	LOGBOOK #:		
SAMPLE NUMBER	SAMPLE DATE	TIME	SAMPLE LOCATION													PROJECT/AREA:		
																COMMENTS/WCP#		
EMF-DWP-1002-W1	10-16-02	1438	WEST PIT	1 @ 250mL	X								X	X	X	N/A	GRAY SOLID POWDER	
EMF-DWP-1002-S1	10-16-02	1503	SOUTH PIT	1 @ 250mL	X								X	X	X	N/A	GRAY SOLID POWDER	
EMF-DWP-1002-F1	10-16-02	1541	EAST PIT	1 @ 250mL	X								X	X	X	N/A	GRAY SOLID POWDER	
EMF-DWP-1002-F2	10-16-02	1546	EAST PIT	1 @ 250mL	X								X	X	X	N/A	GRAY SOLID POWDER	
																*PLEASE RUSH*		
																Fax 208.234-5305		
Relinquished By Sampler: <i>Juan B. Steeg</i> 10-16-02/1611 DATE/TIME					Received By: <i>[Signature]</i> 10/21/02 @ 9:52 DATE/TIME													
Relinquished By: _____ DATE/TIME					Received By: _____ DATE/TIME													
Relinquished By: _____ DATE/TIME					Received By: _____ DATE/TIME										Contact: RCRA ENVIRONMENTAL SPECIALIST J.R. SIMPLOT COMPANY (208) 234-5396 P.O. BOX 912 POCATELLO, ID 83204			
Relinquished By: _____ DATE/TIME					Received By: _____ DATE/TIME													
Relinquished By: _____ DATE/TIME					Received By: _____ DATE/TIME													

## **MFG OFFICE LOCATIONS**

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